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PRE-CERCLIS SCREENING ASSESSMENT
AMERICAN SCREW AND RIVET
SCR0000006635
ANDERSON, SOUTH CAROLINA
ANDERSON COUNTY

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Prepared by:

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September 20, 2011

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SCDHEC	**SCDHEC**	**Section, USEPA Region IV**

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1.0 INTRODUCTION

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the Site Assessment Section, South Carolina Department of Health and Environmental Control (SCDHEC) conducted a Pre-CERCLIS Screening Assessment (PSA) at the American Screw and Rivet Site in Anderson County, South Carolina. The information gathered from this investigation will be used to decide if the site will be placed on CERCLIS or managed by some other means.

2.0 LOCATION

The site is located at 1625 Manse Jolly Road in Anderson, SC (Figure 1, Ref. 1). Geographic coordinates for the site are 34.5913130° North, 082.6792440° West (see Appendix B).

3.0 OWNERSHIP

Site Owner: William Stein
Address: (b)(6) Personal Privacy **State:** SC (Ref. 6)
Most Recent Site Operator: American Screw
Phone: Not listed

4.0 SITE HISTORY and DESCRIPTION

The American Screw and Rivet facility (site) is located at 1625 Manse Jolly Rd., Anderson, SC. Various types of rivets were manufactured at the facility since the 1960's. The site contains a one-story building where the company manufactured steel screws and rivets. The area surrounding the site is a mixture of light industrial, woods, and residences. There is also a small pond that receives the drainage from the facility. On November 2010 SCDHEC received information that the facility had stopped operations due to a court ordered bankruptcy (Refs. 2, 4).

In May 2011, SCDHEC conducted an inspection of the facility and documented leaking holding tanks and overflowing sumps. SCDHEC also documented the presence of approximately 80 poly totes some of which were labeled hazardous waste, drums, as well as other containers such as pails, small plastic drums and cardboard containers (Ref. 2, 4).

On June 02, 2011, SCDHEC referred the site to EPA's removal program for assessment. Initial assessments from the facility revealed 44 poly totes exposed to the elements. Some totes exhibited cage corrosion and an advanced state of degradation. After entering the facility's building, the EPA On Scene Coordinator observed overflowing sludge filled sumps, water puddles in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation some of which had spilled their contents, drums, and multiple other containers. The roof was badly deteriorated to the point that rain drained into the interior of the building through ruptured areas and other apertures (Ref. 2, 5).

A series of waste treatments pits were located behind the facility. It is not known if these were ever used.

To date, the following are some of the hazardous materials that have been collected and removed from the site by the EPA:

- 26,000 gallons of pH 2 liquids were loaded and shipped off site for disposal.
- Various materials containing pH 10 solids were collected into four roll off containers.
- Three vacuum boxes were filled with pH 10 sludge.
- Two vacuum tankers collected approximately 10,200 gallons of pH 10 liquids and removed the material from the Site for disposal
- Amosite asbestos fire brick (Ref. 2).

5.0 PATHWAY EVALUATION

5.1 GROUNDWATER MIGRATION PATHWAY

Private residential groundwater use was not noticed during prior site visits. All residents appear to be supplied by a municipal water supply within one-quarter mile (Ref. 3).

5.2 SURFACE WATER MIGRATION PATHWAY

The site drains towards a pond that sits on the property. There is evidence that the pond is being used for fishing and recreation by local residents (i.e. bait container, beer cans, etc). The pond drains into a creek that flows lest than a mile to Lake Harwell. The lake is a known fishery and is used for recreation (Ref. 3).

5.3 SOIL EXPOSURE / AIR PATHWAYS

Two residences are located within 200 feet of the site (Refs. 1,3). Currently, access is being restricted by EPA activities. However, following the completion of EPA's removal operation, access to the site will be difficult to prohibit.

The facility is not in operation and air emissions are unlikely. Hence, the Air Pathway was not evaluated for this investigation.

6.0 SUMMARY AND CONCLUSIONS

The American Screw and Rivet facility (site) is located at 1625 Manse Jolly Rd., Anderson, SC. The facility manufactured various types of rivets at the facility since the 1960's. On November 2010 the South Carolina Department of Health and Environmental Control received information that the facility had stopped operations due to a court ordered bankruptcy.

SCDHEC referred the site to EPA's removal program for assessment. Initial assessments from the facility revealed 44 poly totes exposed to the elements, overflowing sludge filled sumps, water puddles in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation some of which had spilled their contents, drums and multiple other containers. The roof was badly deteriorated to the point that rain drained into the interior of the building through ruptured areas and other apertures.

There is evidence that local residents are using the pond behind the site for fishing and recreation.

It is recommended that the American Screw and Rivet Site should receive a HIGH priority for further evaluation under CERCLA. SCDHEC proposes to conduct a Preliminary Assessment (PA) and Site Inspection (SI) at the site following the completion of EPA removal activities. The PA and SI will focus on the Surface Water Pathway, specifically the pond behind the site that appears to be used for recreation by local residents.

7.0 REFERENCES

1. Google, Inc. Google Earth. 2010.

2. USEPA. Pollution Reports 1 thru 9. American Screw and Rivet. http://www.epaosc.org/site/sitrep_list.aspx?site_id=6972

3. SCDHEC Trip Report. Kelly Road Site. March 23, 2011.

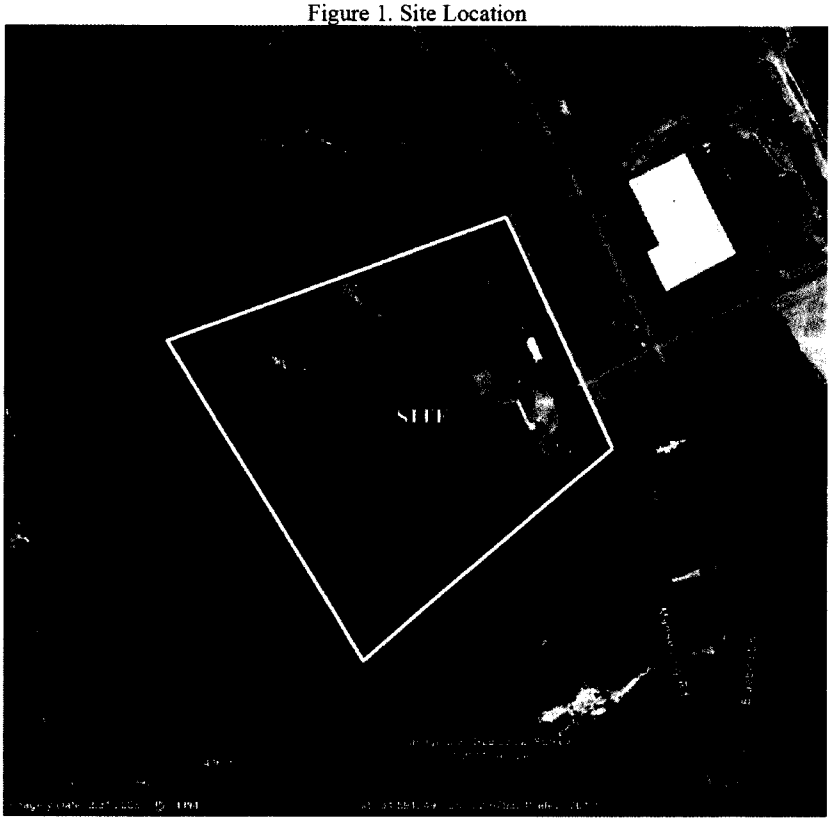
4. SCDHEC. American Screw and Rivet Corporation Referral.

5. USEPA. American Screw and Rivet. EPA Emergency Removal Action. June 6, 2011.

6. Anderson County Property Viewer. http://gisserve.andersoncountysc.org/propertyviewer/

APPENDIX A: MAPS & FIGURES

Figure 1. Site Location



APPENDIX B: TRIP REPORT

Trip Report
American Screw and Rivet
Union County
June 22, 2011

SCDHEC Site Assessment visited the American Screw and Rivet site on the above referenced date. Personnel present were:

Jason Williams, SCDHEC Project Manger
Robert Cole, SCDHEC Site Assessment

Met with OSC Crowley at approx. 10AM. Removal activities are being conducted at the site, focusing on material stabilization on the interior.

The site contains a one story building were the company manufactured steel screws and rivets. The area surrounding the Site is a mixture of light industrial, woods, and residences.

The site drains towards a pond that sits on the property. There is evidence that the pond is being used for fishing and recreation by local residents (i.e. bait container, beer cans, etc). The pond drains into a creek that flows lest than a mile to Lake Harwell. The lake is a known fishery and is used for recreation.

Two residences are located within 200 feet of the site. The EPA has improved fencing around the site.

A Visual Well Survey (VWS) was conducted. All residents appear to be supplied by a municipal water supply within one-quarter mile.

APPENDIX C: SITE COORDINATE COLLECTION

Site Latitude: 33.754524° North

Site Longitude: 079.450000° West

Feature Description:[JGM1] Main Entrance

Collection Date: June 2, 2010

Note: Site Coordinates collected as Decimal Degrees (WGS84 datum) using a General-Use GPS with WAAS (estimated accuracy ~5 meters).

APPENDIX D : PRE-CERCLIS SCREENING ASSESSMENT CHECKLIST

PRE-CERCLIS SCREENING ASSESSMENT CHECKLIST/DECISION FORM

SITE INFO

Site Name: American Screw and Rivet		
Previous/Other Names: N/A		
Street Address: 1625 Manse Jolly Road		
City: Anderson	**County:** Anderson	**Zip:** 29621
Latitude: 34.5913130° North,	**Longitude:** 34.5913130° North,	

CHECKLIST: EXPLAIN ALL "YES" ANSWERS.

		YES	NO
1.	Does the site already appear in CERCLIS?	☐	☒
2.	Is the release from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures?	☐	☒
3.	Does the site consist of a release of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	☐	☒
4.	Is the release into a public or private drinking water supply due to deterioration of the system through ordinary use?	☐	☒
5.	Is some other program actively involved with the site (i.e., another Federal, State, or Tribal program)? Superfund Removal	☒	☒ CWT
6.	Are the hazardous substances potentially released at the site regulated under a statutory exclusion (i.e., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	☐	☒
7.	Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferral to RCRA Corrective Action)?	☐	☒
8.	Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, EPA approved risk assessment completed)?	☐	☒

Explanations:[JGM1] See Below

DISCUSSION / DECISION RATIONALE

Site Determination

☒ **Enter into CERCLIS. Further assessment is recommended (explain below).**

☐ **The site is not recommended for placement into CERCLIS (explain below).**

Rationale: [JGM2] The facility manufactured various types of rivets at the facility since the 1960's. On November 2010 the South Carolina Department of Health and Environmental Control received information that the facility had stopped operations due to a court ordered bankruptcy.

Initial assessments from the facility revealed 44 poly totes exposed to the elements, overflowing sludge filled sumps, water puddies in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation some of which had spilled their contents, drums and multiple other containers. The roof was badly deteriorated to the point that rain drained into the interior of the building through ruptured areas and other apertures. There is evidence that local residents are using the pond behind the site for fishing and recreation.

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C Hendrix 9/20/2011
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APPENDIX E: ATTACHED REFERENCES

AMERICAN SCREW & RIVET CORPORATION REFERRAL

From Tyler Smith, Solid/Hazardous Waste, SCDHEC EQC Region 1

Site Information:

http://americanscrewandrivet.com/index.html

- American Screw & Rivet Corporation
  1625 Manse Jolly Rd.
  Anderson, SC 29621
- American Screw & Rivet Corporation
  1 American Way
  Anderson, SC 29621

TIMELINE

11/11/2010

- American Screw & Rivet Corporation is shutdown for business. (Please see attached PDF document labeled AmericanScrewRivet.pdf)

11/15/2010

- Site visit to both facilities. Photos were taken at both facilities to assure site security.

11/16/2010

- Received call from Terry Vinkovich (b)(6) Personal Privacy employee at American Screw & Rivet stating that business was shutdown and chemicals were stored at both properties. Terry Vinkovich said to contact Skip Hales at (b)(6) Personal Privacy concerning American Screw & Rivet. Terry Vinkovich also stated that Murph Ivey was the Production Manager of American Screw and Rivet and that he could have some information. Murph Ivey is married to Nancy Stein, who is one of the owners of American Screw & Rivet.
- Paul Wilkie, Jr. called and spoke with Skip Hales. Skip Hales stated that American Screw & Rivet was in bankruptcy and he was a receiver for the property and that Randy Skinner Law Office was the trustee for the property. Robert Fields, (Fields LLC), has been hired by the trustee of the site.
- Paul sent an email to Skip Hales concerning the storage of solid and hazardous waste at both locations. (See email dated 11.16.2010)
- Paul called Murph Ivey and left a message on his phone (b)(6) Personal Privacy

11/19/2010

- Paul called Skip Hales and asked if there was any further movement with the two American Screw & Rivet sites. Skip Hales indicated that he was at the American Screw & Rivet site at 1 American Way in Anderson. Paul met Skip Hales and Robert Fields at the American Way Site. (See email dated 11.19.2010)

12/2/2010

- I called Skip Hales and asked that the Manse Jolly Site entrance gate to the facility be locked.

12/9/2010

- I sent Skip Hales an email concerning any further news with the Manse Jolly Site. (See email dated 12/9/2010)

12/10/2010

- Site visit to both facilities. Pictures were taken documenting waste stored outside of both facilities. (See Photos)

12/31/2010

- Paul contacted Murph Ivey and advised him to contact an environmental contractor concerning the disposal of all waste materials at the Manse Jolly Site. (See attached correspondence from Safety Kleen – dated 1/13/2011)

1/25/2011

- Paul met with Murph Ivey to discuss site conditions and previous site operations at the Manse Jolly Site. Murph Ivey indicated he would contact his lawyer about getting access to the Manse Jolly Facility.

2/10/2011

- Paul spoke with Skip Hales about getting access to the Manse Jolly Site. Skip Hales indicated that the court system has not appointed a trustee to the Manse Jolly Site and to contact Murph Ivey's lawyer if access to the facility was needed.

4/4/2011

- I stopped at Murph Ivey's house and spoke with him about getting access to the Manse Jolly Site. Murph Ivey said he hadn't heard any news regarding the court appointing a trustee to the site. Murph Ivey said he would contact his lawyer regarding this matter.

5/4/2011

- Paul went by Murph Ivey's house, but no one was home. Paul left a voicemail.

5/23/2011

- Murph Ivey came by the Anderson EQC office to discuss sale of American Screw and Rivet assets and the trustee of the Manse Jolly Site.

5/24/2011

- Paul called Randy Skinner's Office and spoke with Karen Hall about getting access to the Manse Jolly Site. Karen Hall called back and said that the facility would be unlocked Friday and that our office would be granted access to the facility.

5/27/2011

- Inspected the inside of the Manse Jolly facility with Paul Wilkie, Jr. at 9:45 am.
- Observed the following items inside of the facility: (this is a rough estimate)
    - Multiple large holding tanks
        - Some are leaking unknown material
    - 1 large sump area
        - sump is full & overflowing
    - Multiple floor drains were noted inside the facility
        - Most were full of unknown liquid material
    - Approximately, 81 poly-totes
        - Approx. 250 gallons each
        - Some were labeled Hazardous Waste (D002)
    - 2 – larger poly-totes
        - Approx. 300-350 each
    - 1 Pallet containing 5 gallon poly drums
        - unknown material
    - 20; 55 gallon drums
        - unknown material
    - 2; 30 gallon drums
        - unknown material

- 1; 25 gallon poly drum
  - labeled Caustic Soda (10%)

- 1; 25 gallon poly drum
  - labeled Sulfuric Acid (93%)

- 1; 25 gallon poly drum
  - labeled Caustic Potash (45%)

- 1 Pallet containing bags of Ammonium Chloride

- 1 Pallet containing bags of Hydrated Lime

- 1 Pallet containing bags of Muriate of Potash (0 – 0 – 62)

- Over 100 cardboard paper drums
  - Containing mostly unknown dry materials
  - Some are labeled Aquaease CB 1 – UN3262 – Sodium Metasilicate
  - Some are labeled Caustic Soda Beads
  - Some are labeled Burn CPD TV

- 8 – Gaylord bags
  - unknown solid material

- Observed 3 processing/dip tank lines
  - Multiple tanks contained unknown liquids

IndependentMail.com
ANDERSON, SOUTH CAROLINA

Production halted at local rivet plant

By Anna Mitchell

Friday, November 12, 2010

ANDERSON —

Stephen Belanger said he showed up to work Thursday to find an auctioneer and a locksmith waiting for him at the doors of American Screw and Rivet Corp.

The status of the company was unclear Friday and its owner could not be reached.

The 46-year-old company has a manufacturing plant on American Way near the junction of S.C. 81 and Interstate 85.

According to the company's website, American Screw and Rivet donated 30,000 copper rivets in the restoration of the Statue of Liberty completed in 1986.

On Thursday and Friday, no activity was apparent at the building. Its lobby, visible through a glass door, was in disarray. Furniture was askew, and a bird cage next to the front door still contained a parrot, his water bottle full but droppings covering paper and tiles on the floor.

Belanger's wife, Jeanne, said the parrot, whose name is Willie, belonged to the company's owner.

The rivet company, which supplies several bed-frame manufacturers and La-Z-Boy, was in litigation with Bank of America until last spring over loan defaults and a lease agreement on machinery at the plant. That case was settled in April.

The company's owner, Nancy Stein, could not be reached by telephone and no one answered any of the phone extensions at the plant. Murph Ivey, listed as the plant's general manager, also could not be reached.

Officials with the South Carolina Department of Employment and Workforce office in Anderson said Friday they had not received notice from anyone at the plant that it was set to close. Spokesman Clark Newsom said employers are not required to notify his agency if they have fewer than 50 workers.

"We do prefer them to let us know anyway," Newsom said. "That way it gives us time to get unemployment benefits working and to get them in the system."

Belanger estimated that 15 people worked at American Screw and Rivet. He said he has worked with machinery for 40 years, rising to the position of plant manager with a

previous employer before that operation shut down. He was a machine operator for the rivet company.

Anderson County Council member Cindy Wilson said she knew Ivey and Stein, though she hadn't spoken with them in years. She said she had driven by the property earlier this week and also noticed little activity at the site. The plant is in her district.

"I hate to hear about any manufacturer having problems," Wilson said. "Small shops are the backbone of our economy."

Belanger said he spoke with the auctioneer when he arrived at work on Thursday and was told his company no longer exists. He was given about half an hour to go inside and grab his tools.

The auctioneer, Skip Hales of W.M. Hales Inc., said Friday he could not say anything about the clients he works for.

"My instructions are, 'No comment,'" Hales said.

He said the bird, though, would be OK.

"We have plans for the parrot," he said.

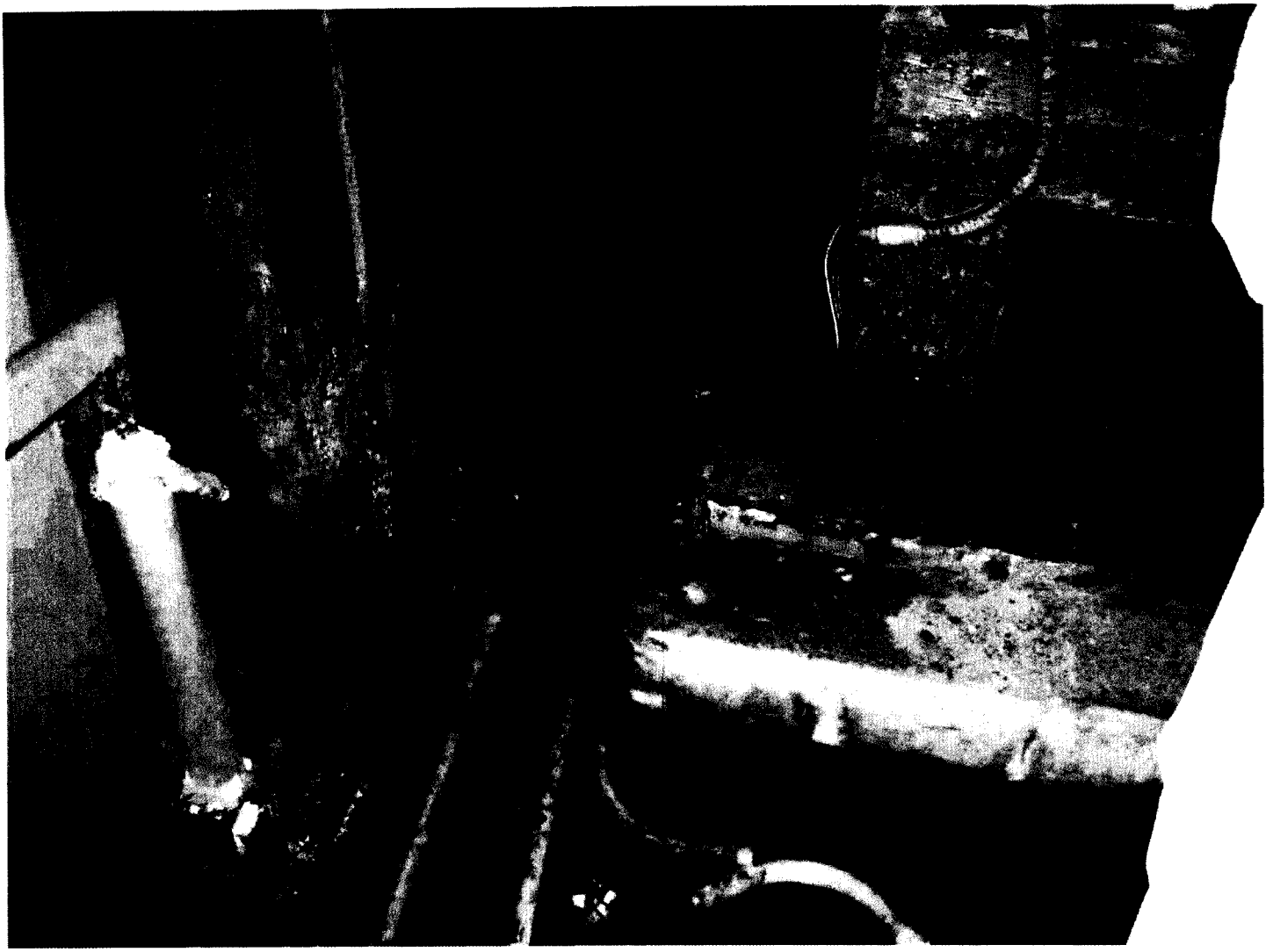
Shae Rozakos, existing industries manager for the Anderson County Economic Development office, said she was familiar with the company but also hadn't heard anything about its closing. The company's attorney in its litigation last spring, Marion Hughes of Greenville, also was not aware of a closing.

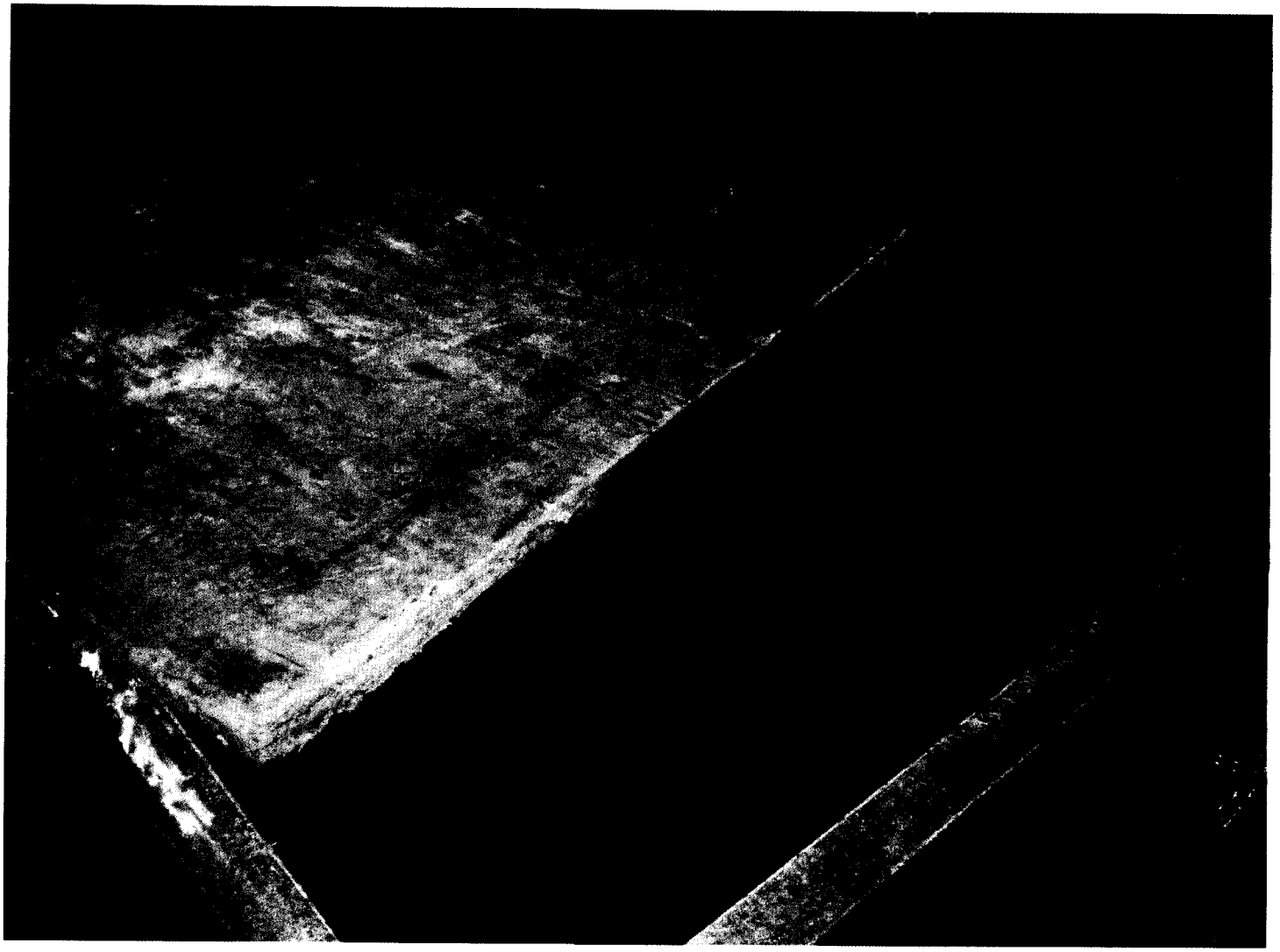
American Screw and Rivet is up to date on its taxes for the property on American Way, according to Anderson Count y records, with a $33,702 payment made on Oct, 1. But the company has a balance due of $16,676 for personal property taxes on equipment.

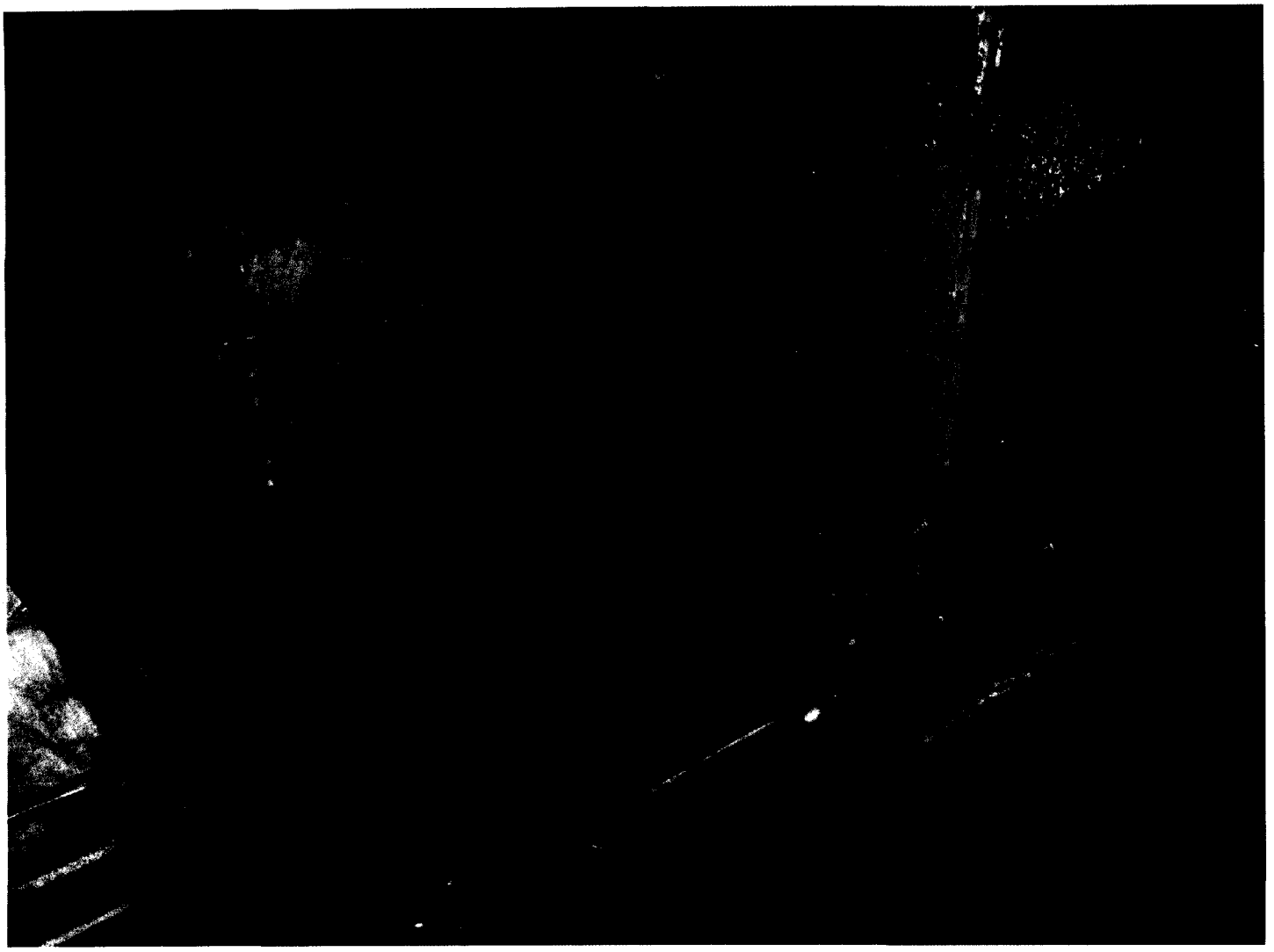
American Screw & Rivet

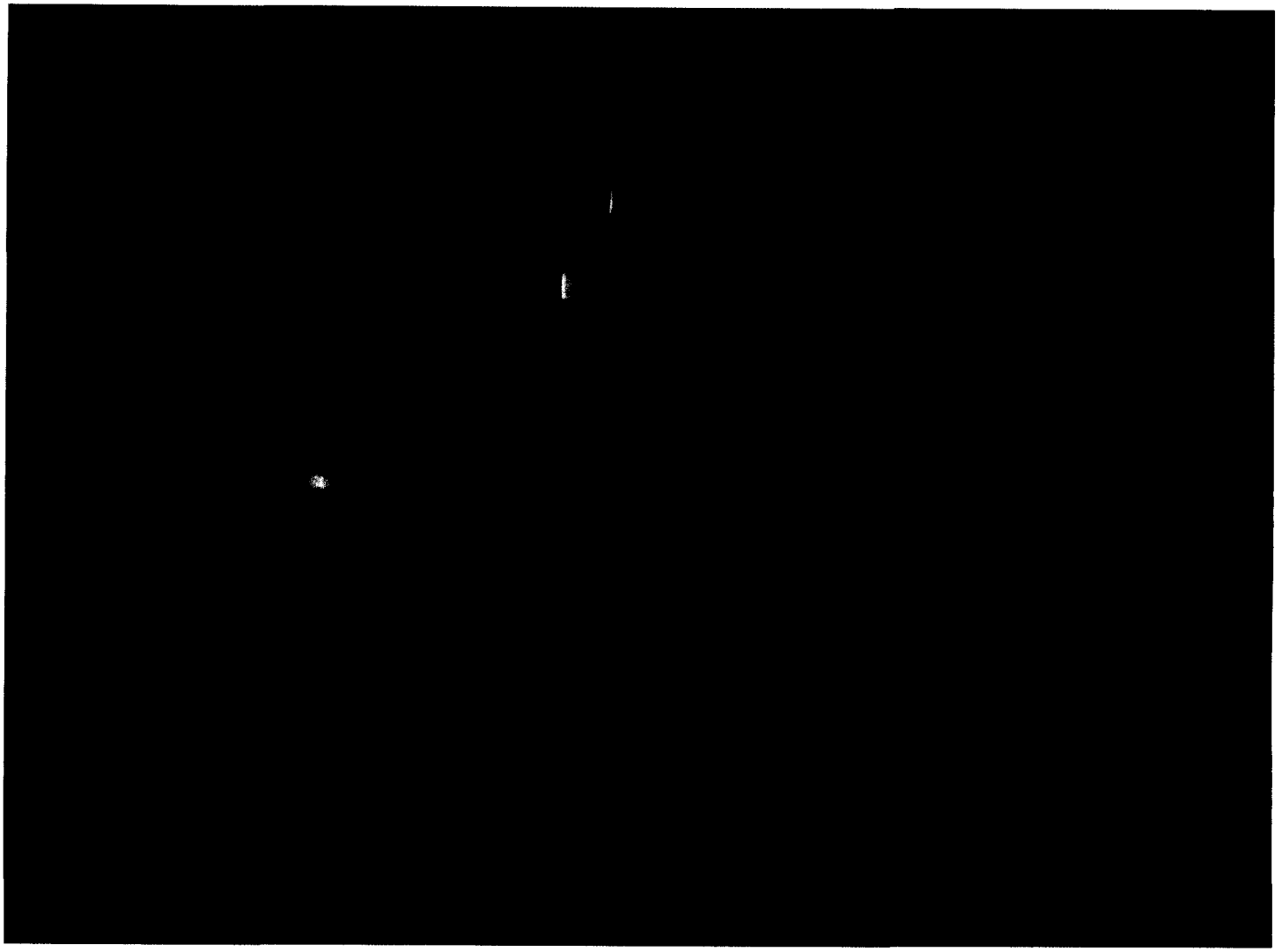
Manse Jolly Site
1625 Manse Jolly Rd.
Anderson, SC 29621

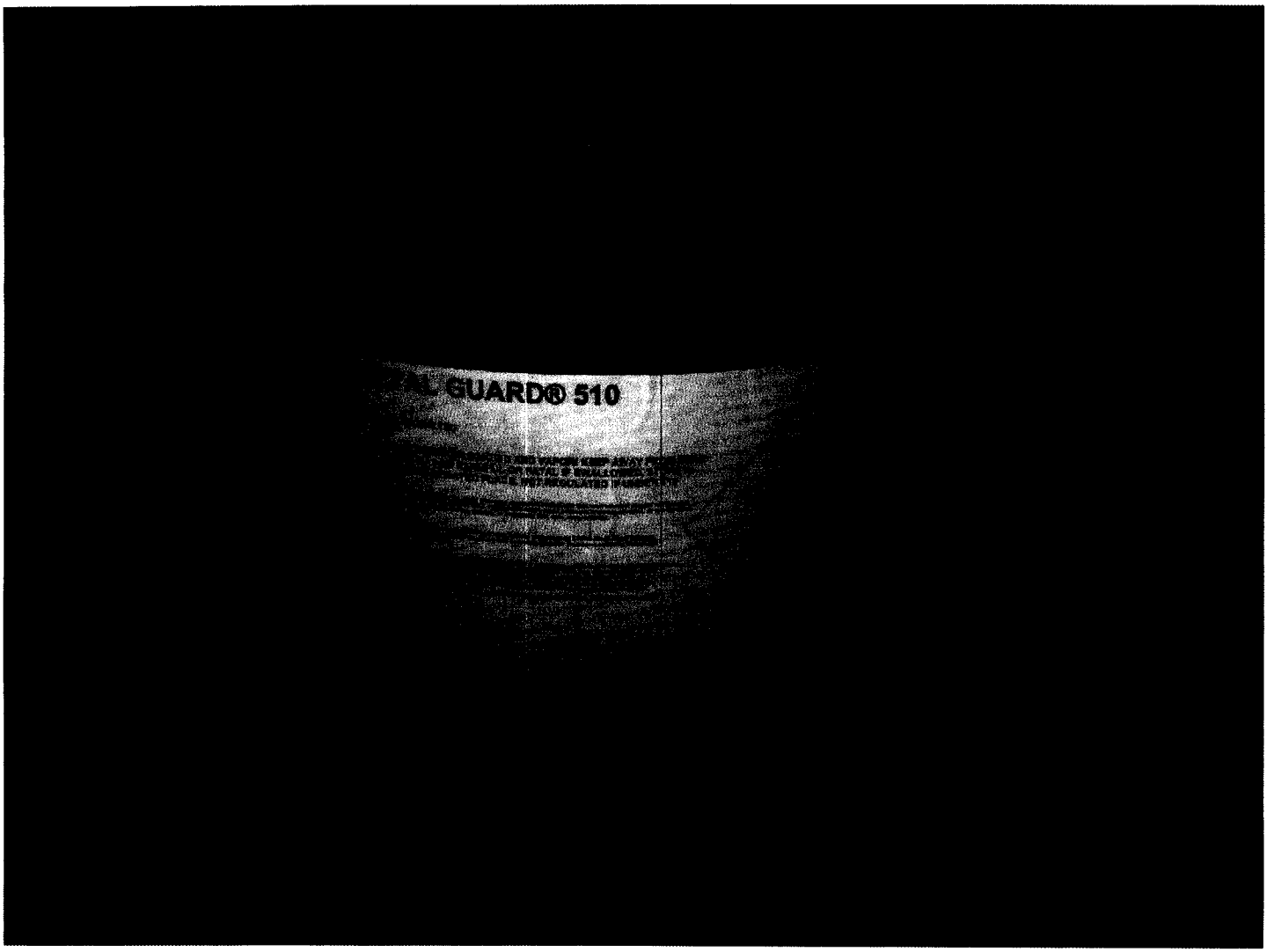
5/27/2011







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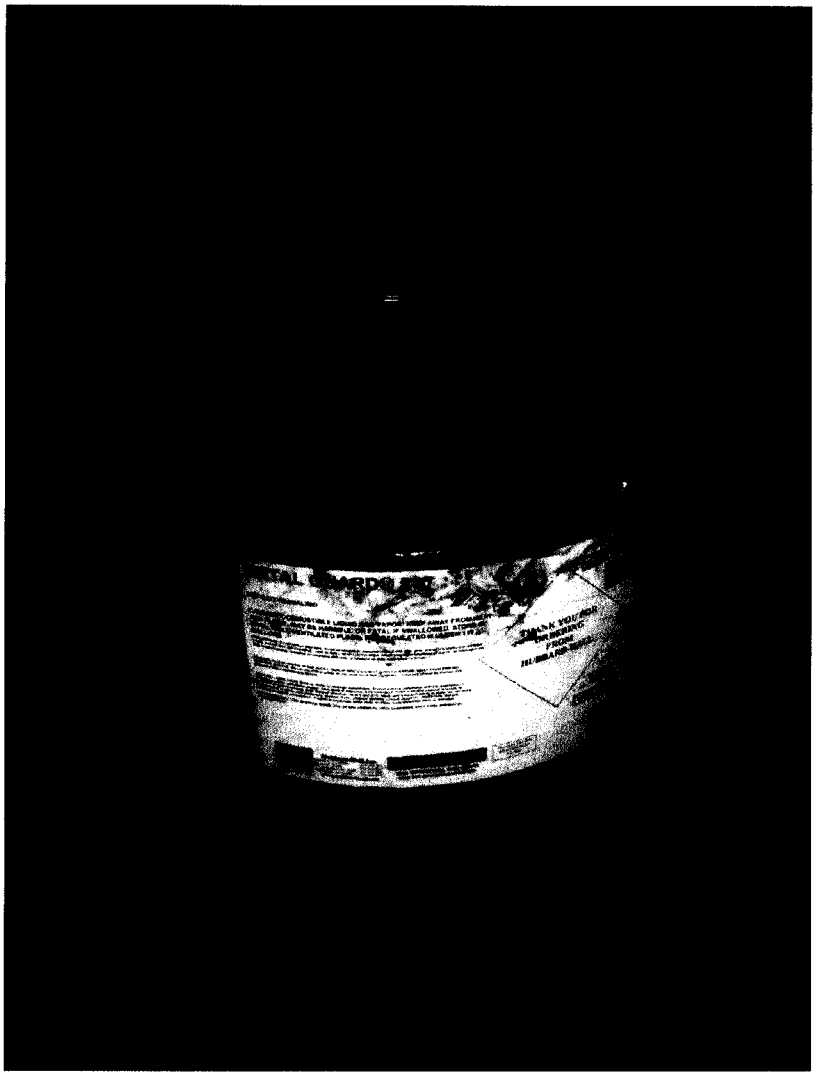

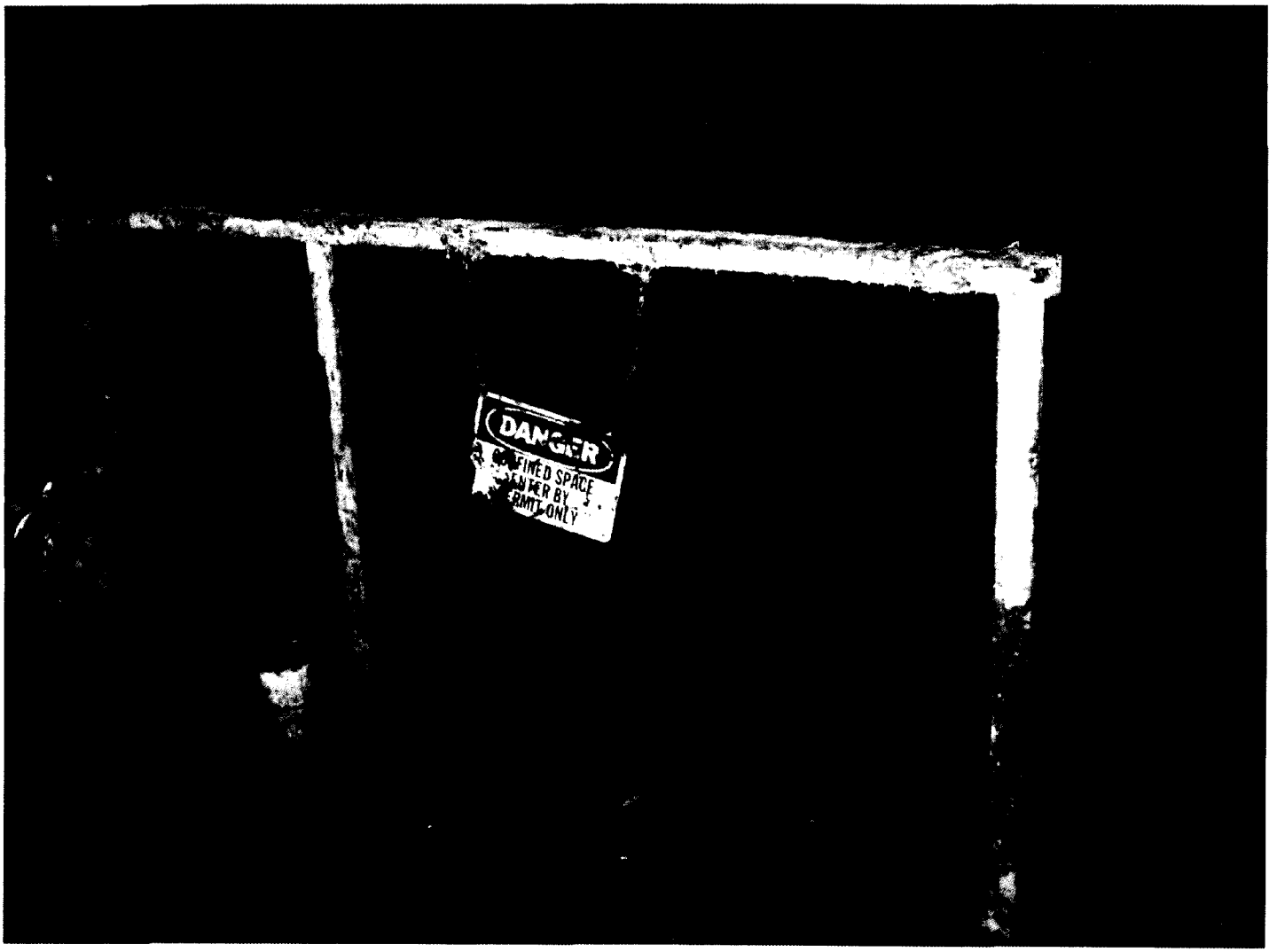
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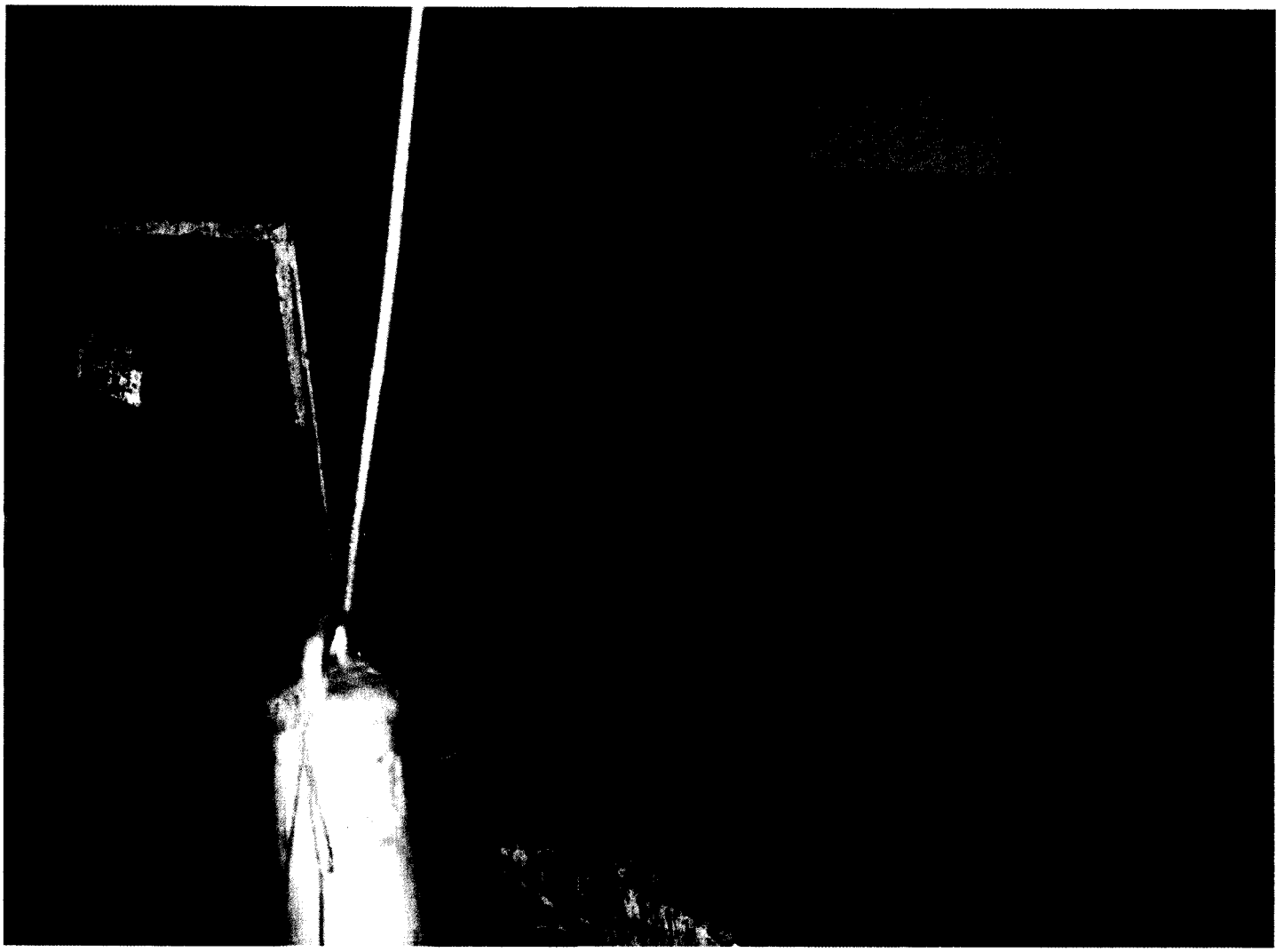

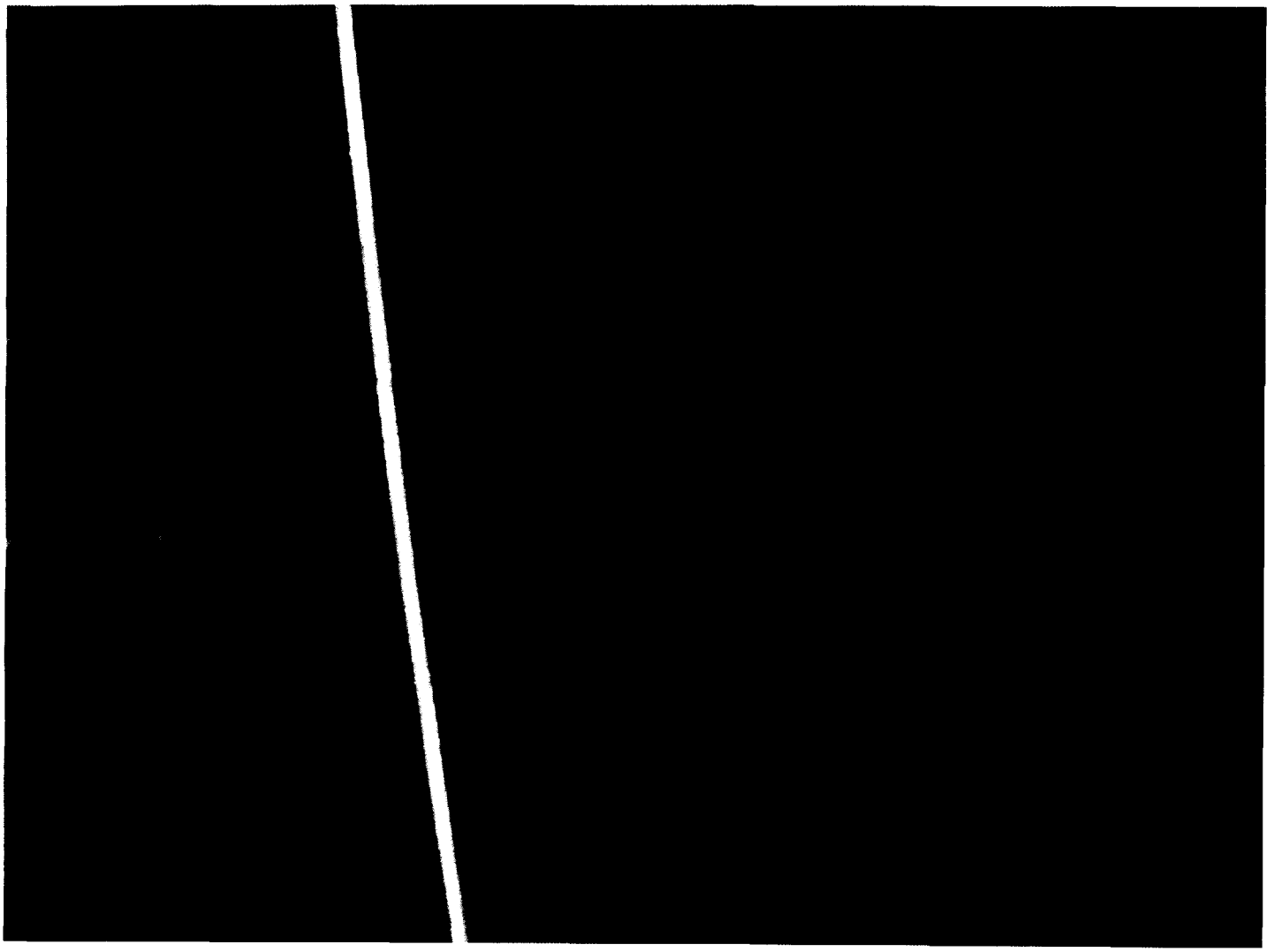

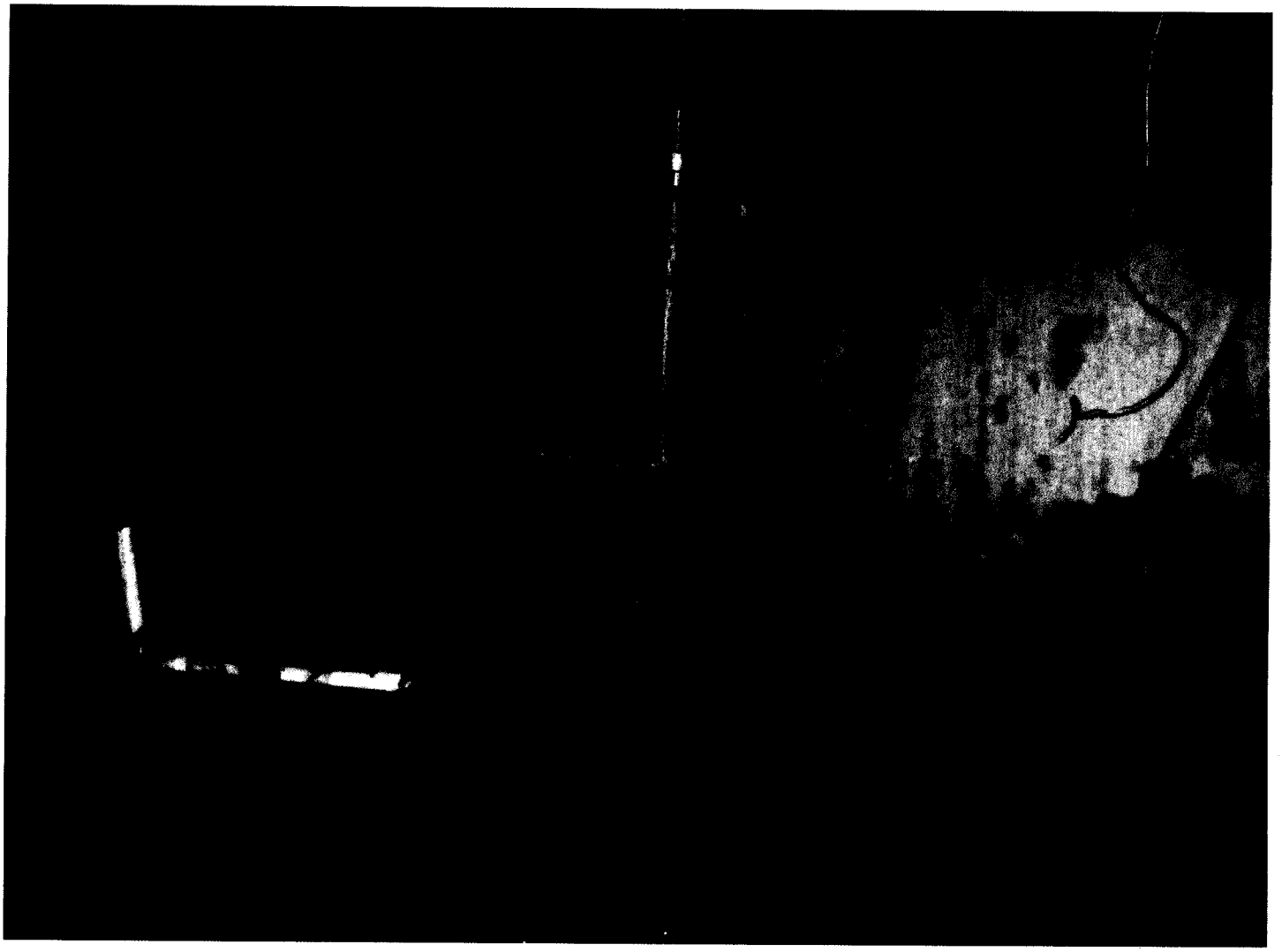

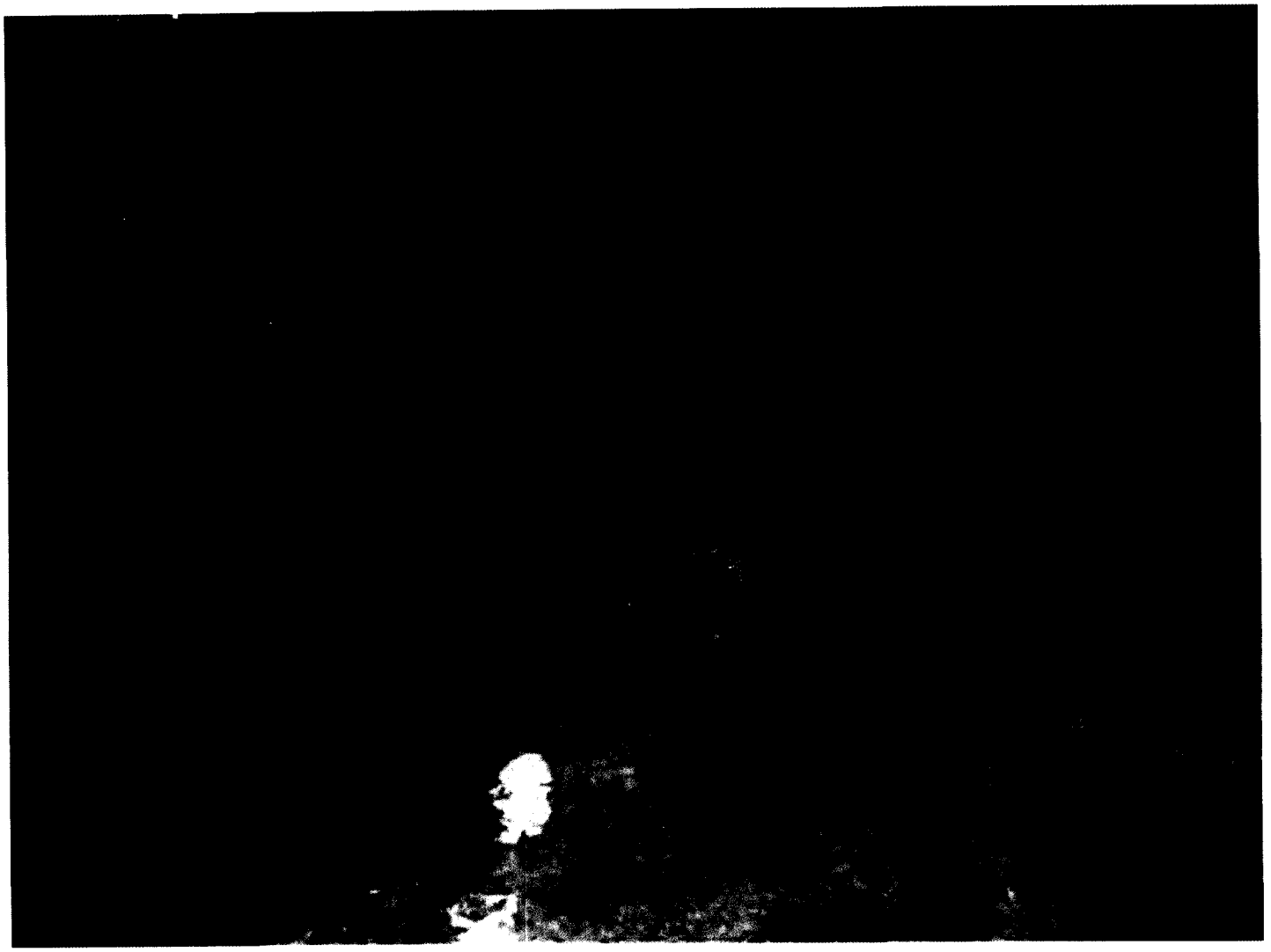


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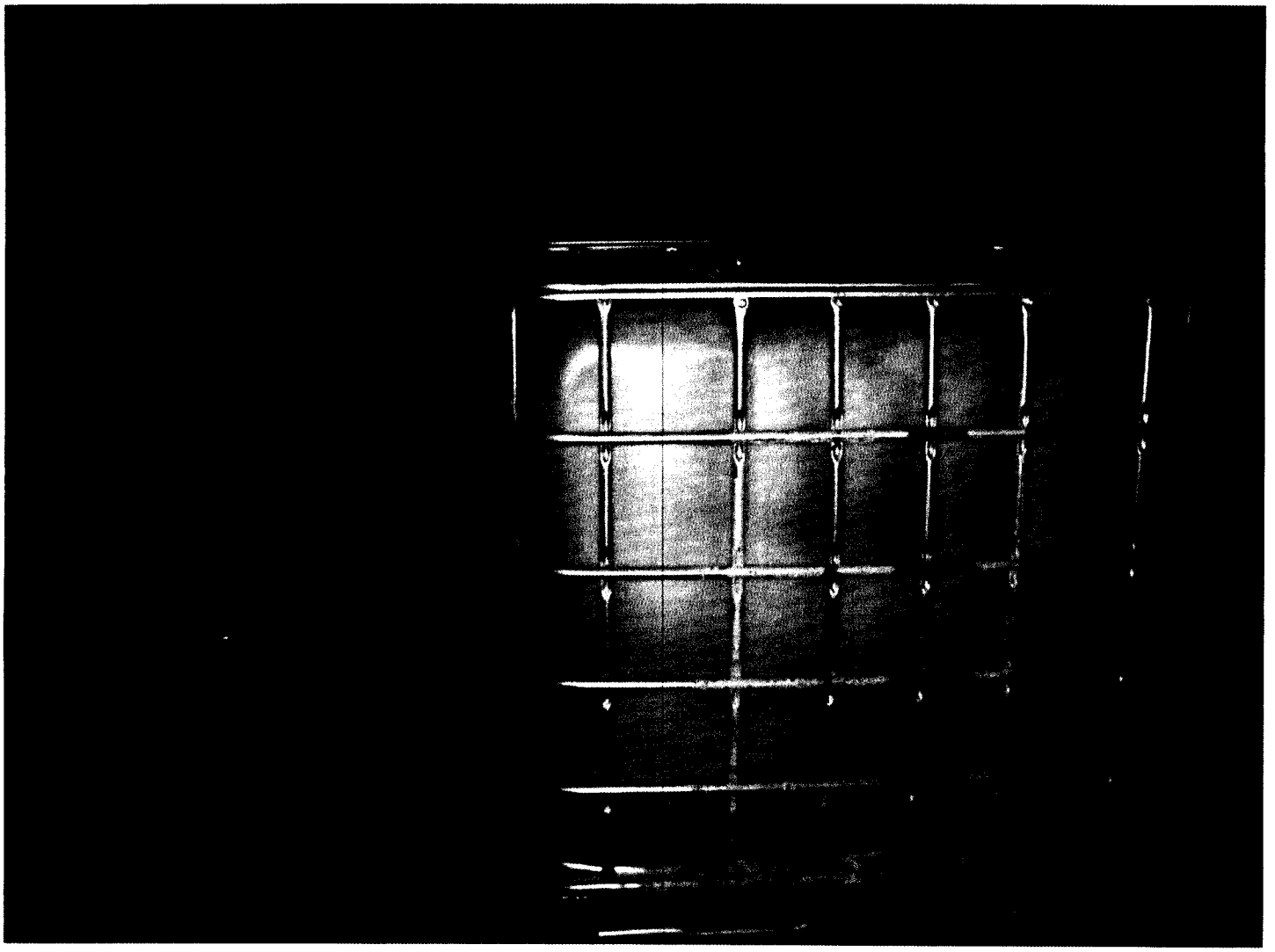

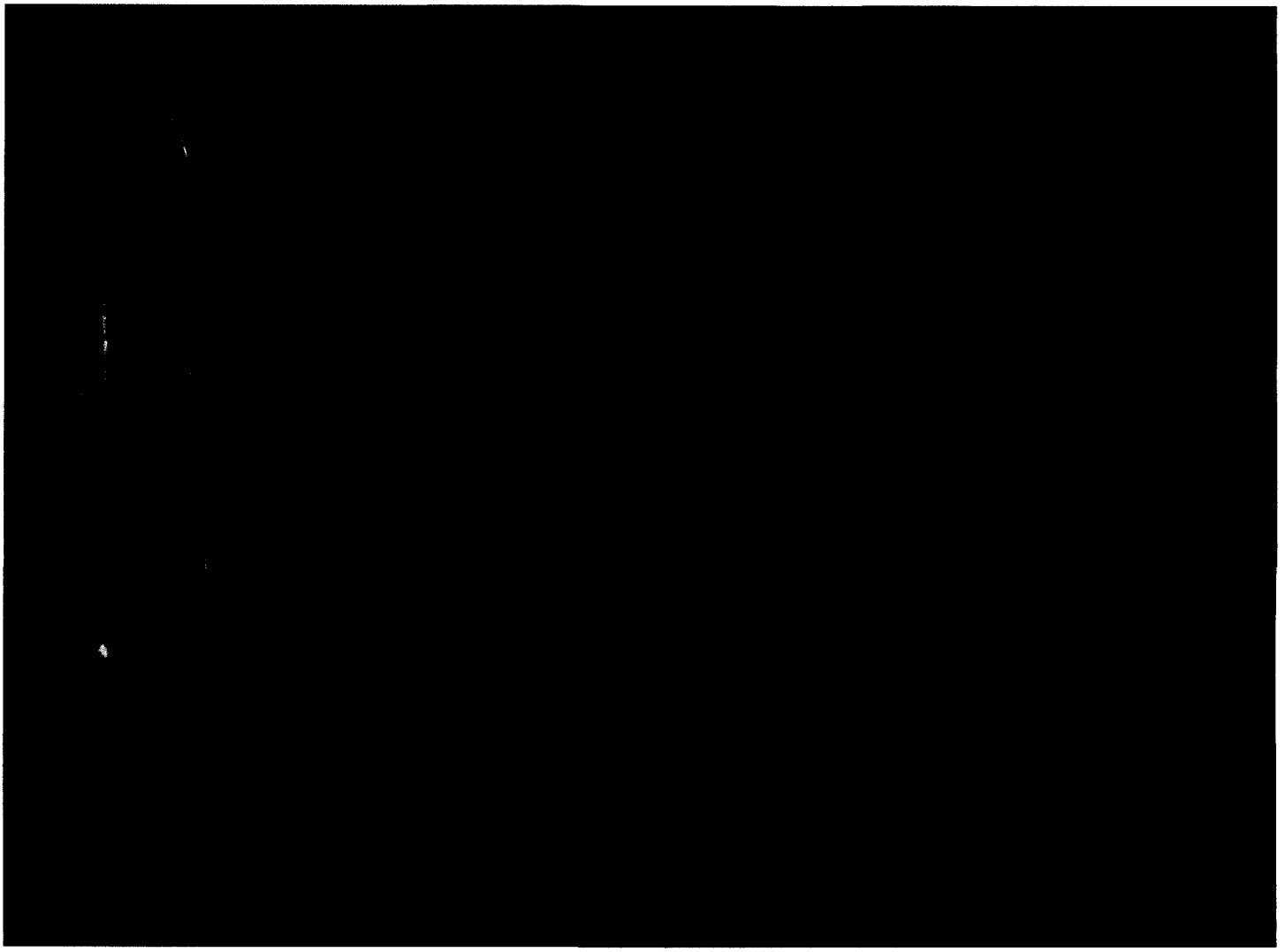

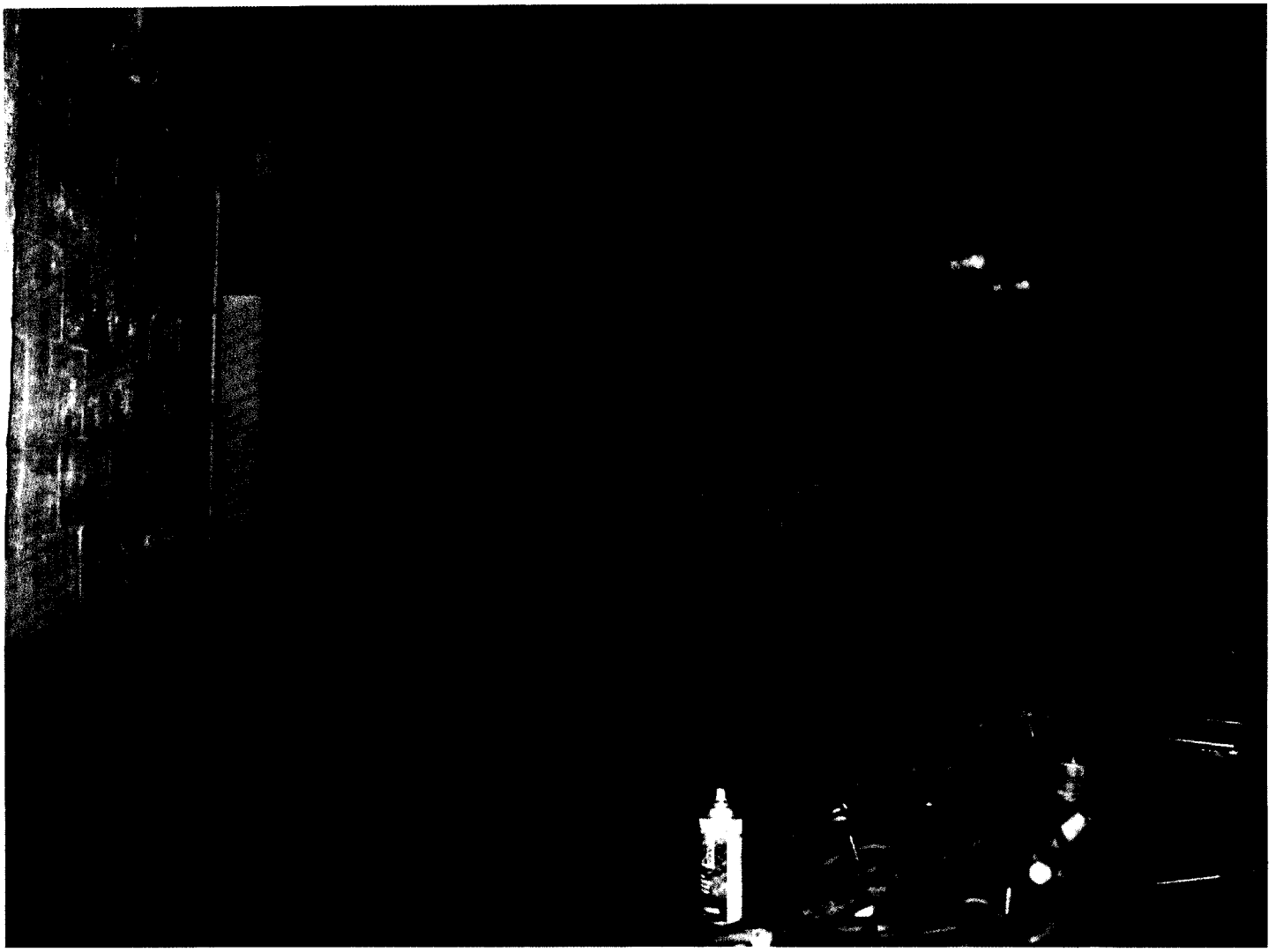

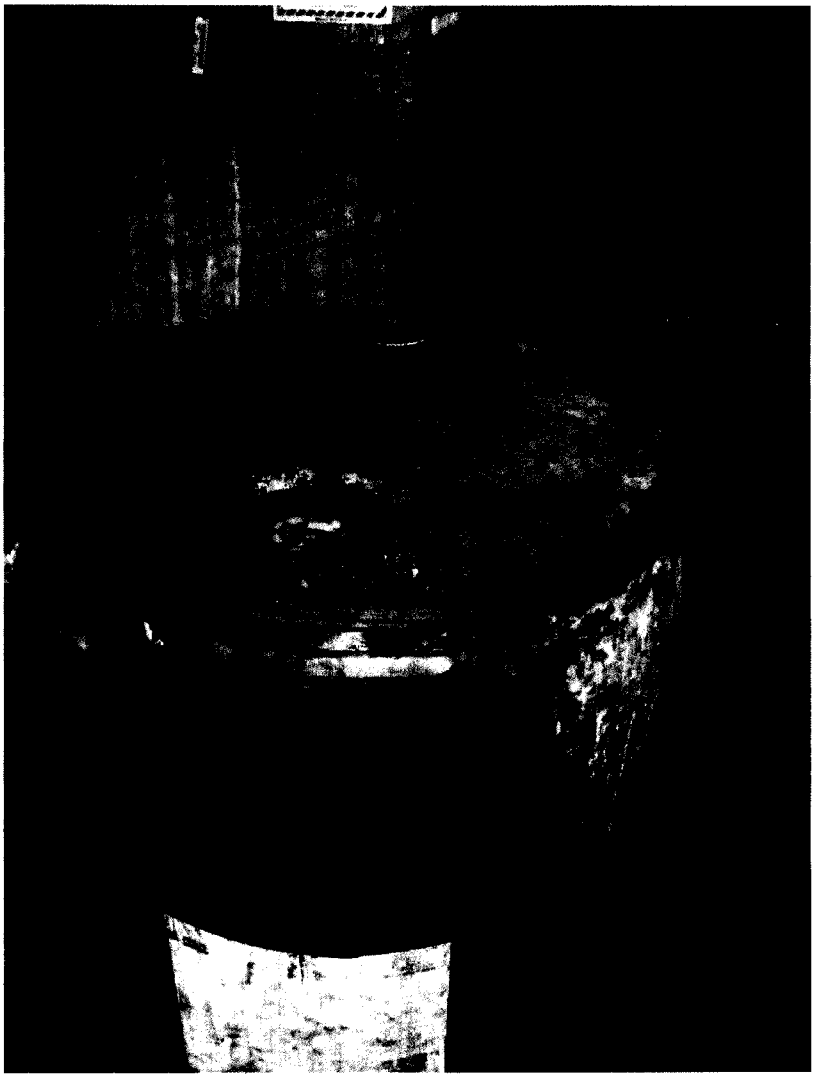

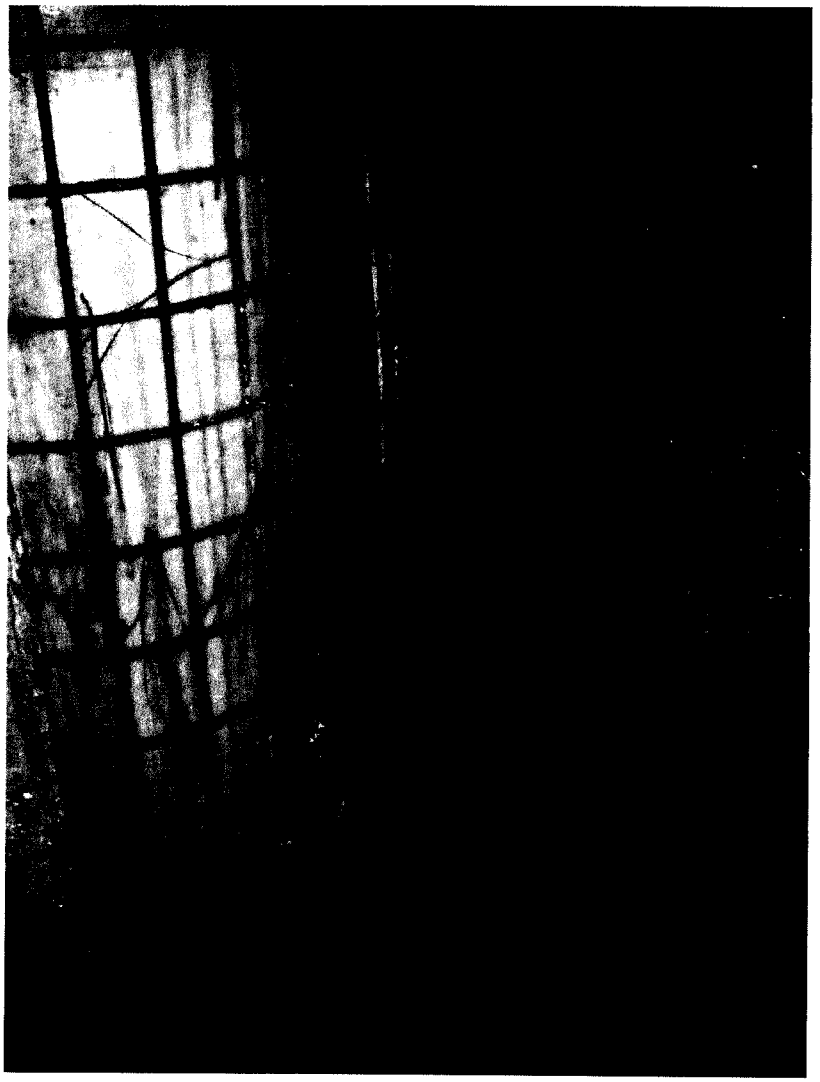

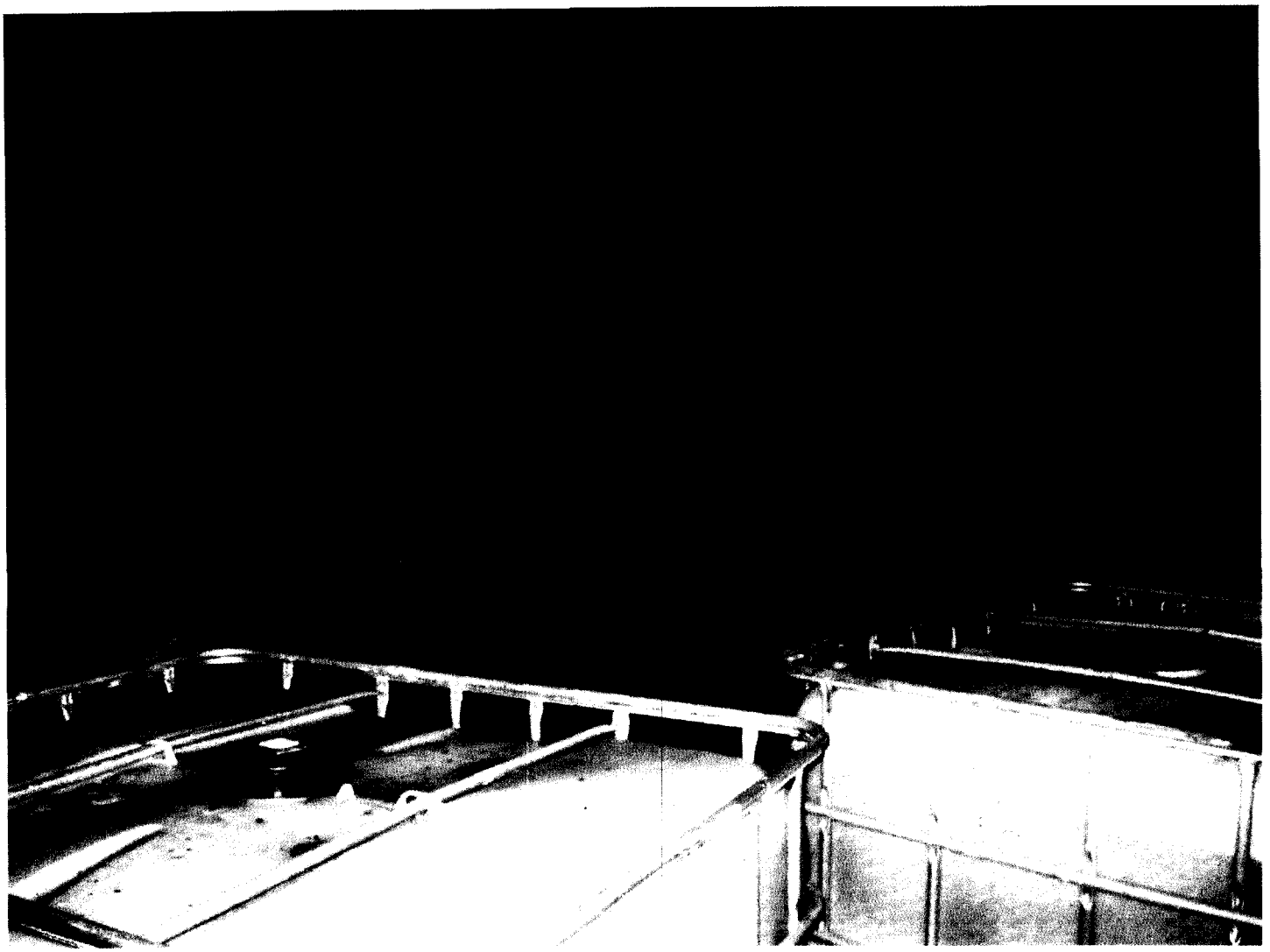

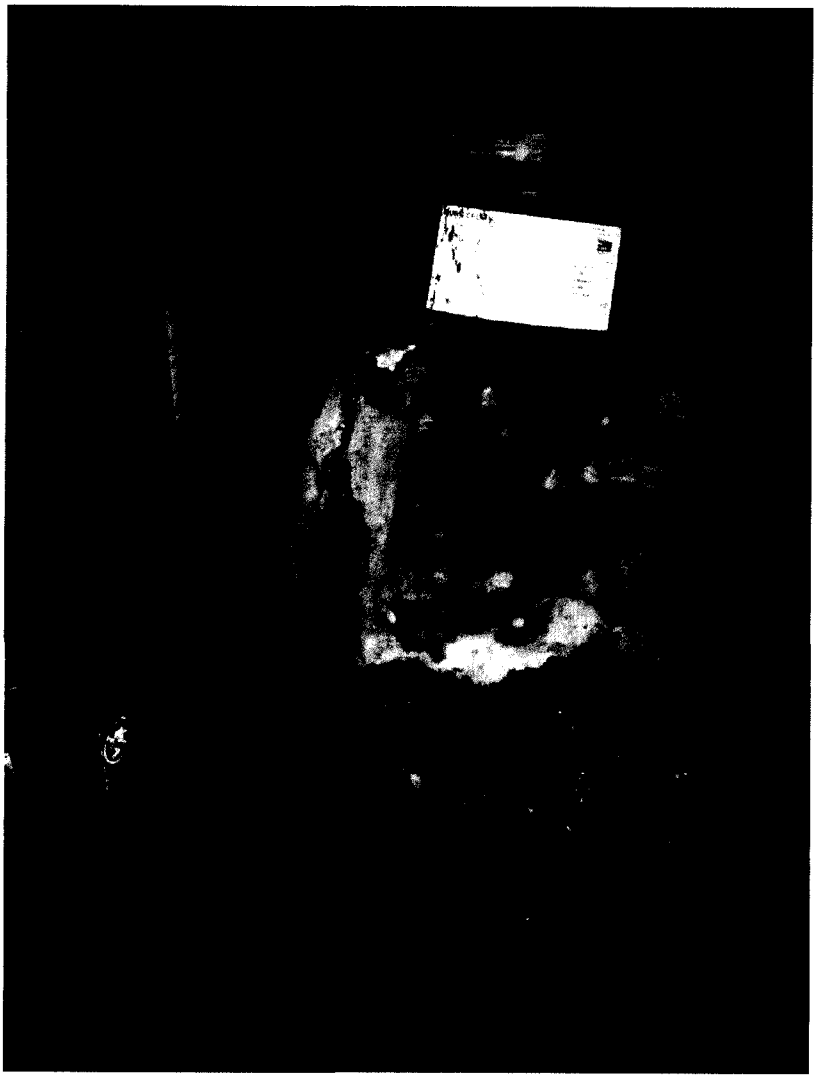


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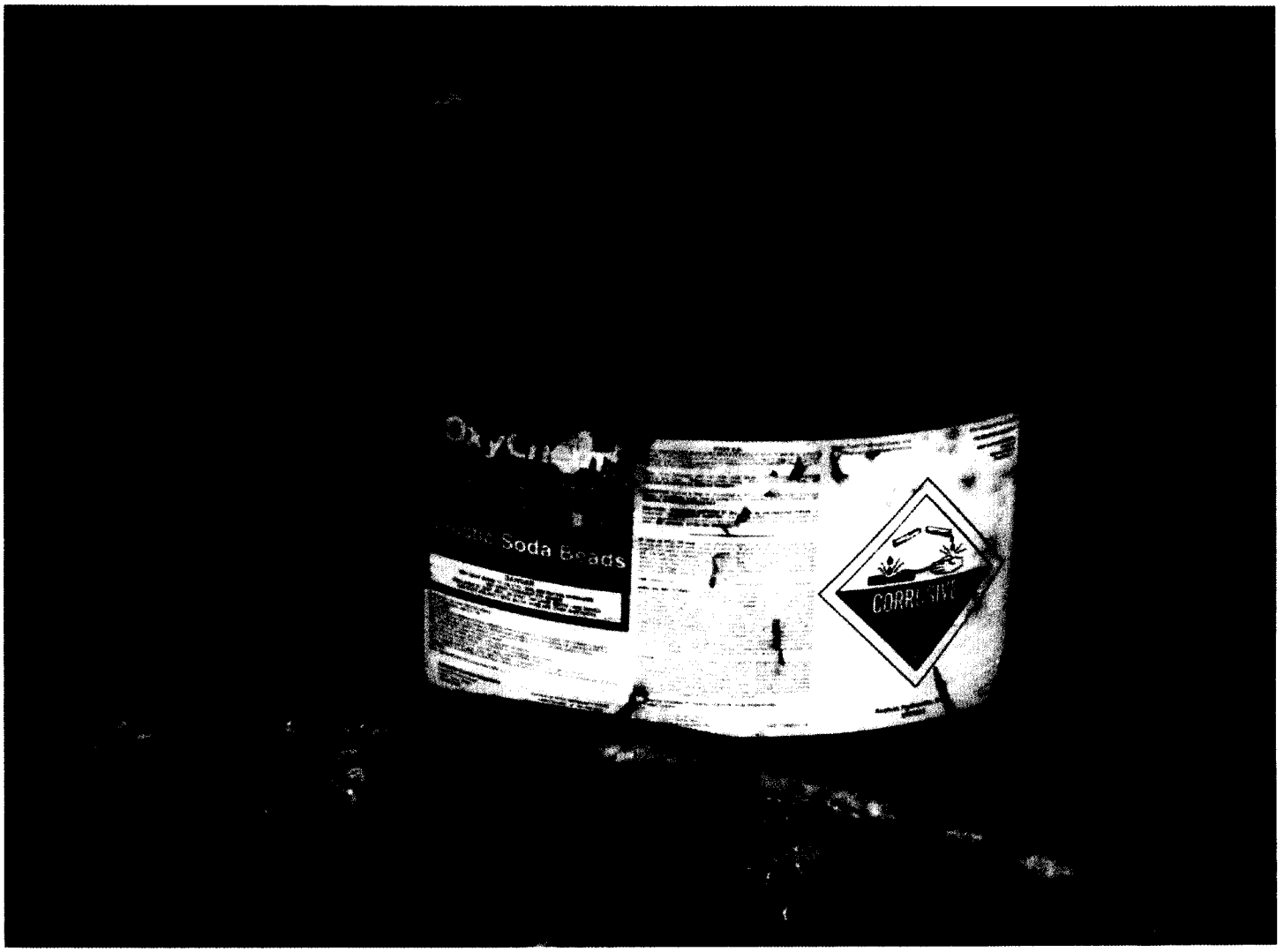
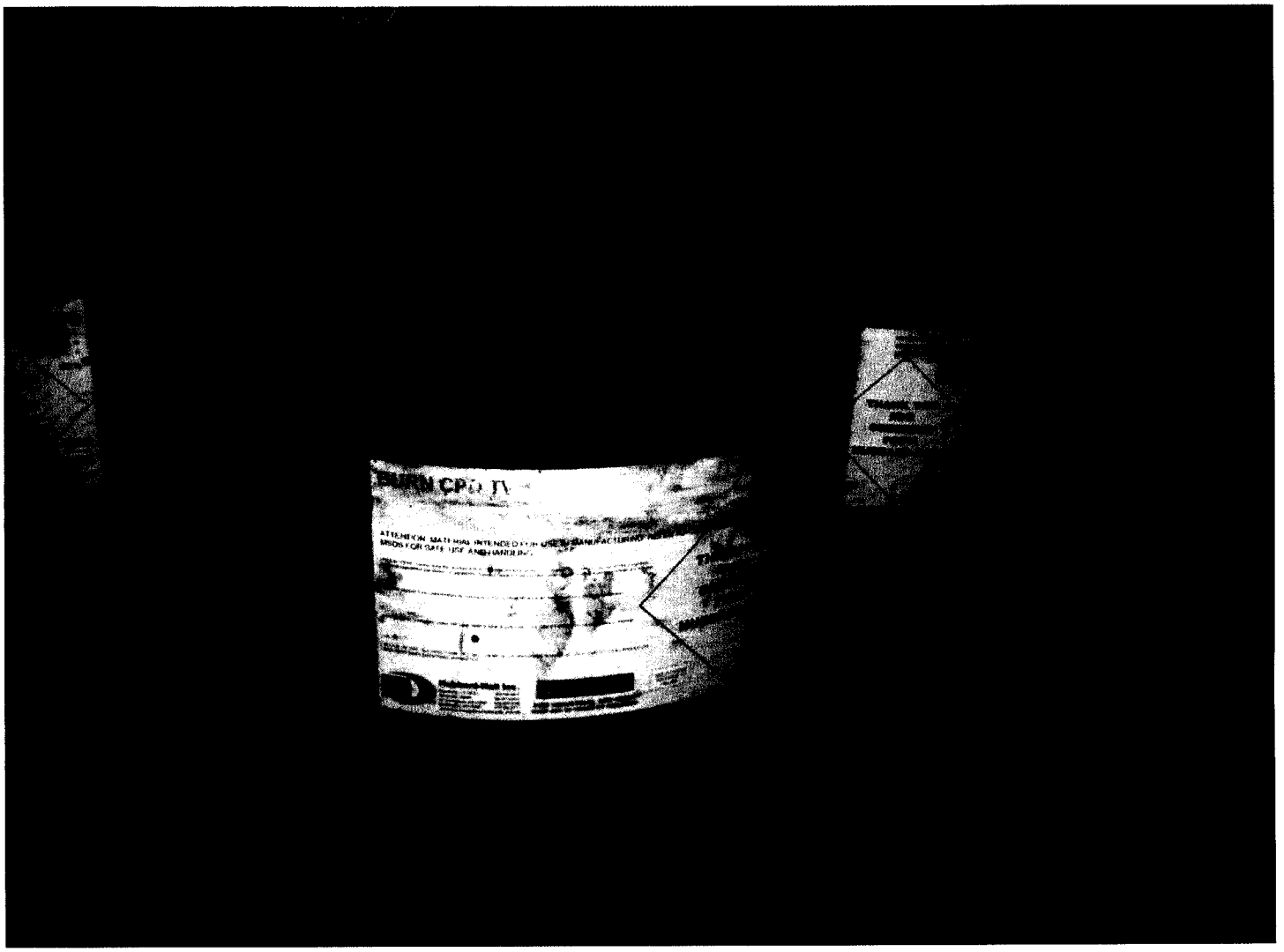
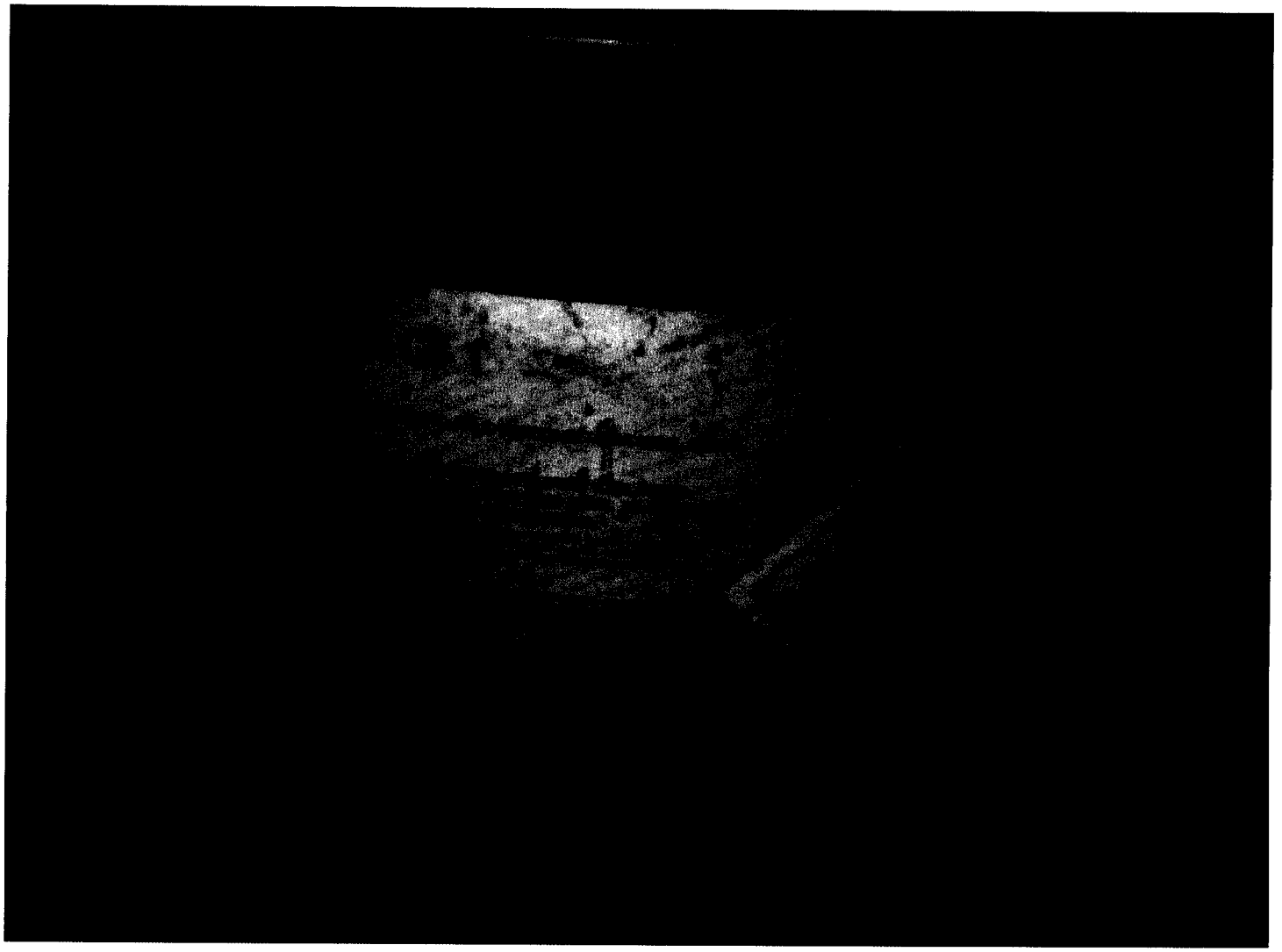
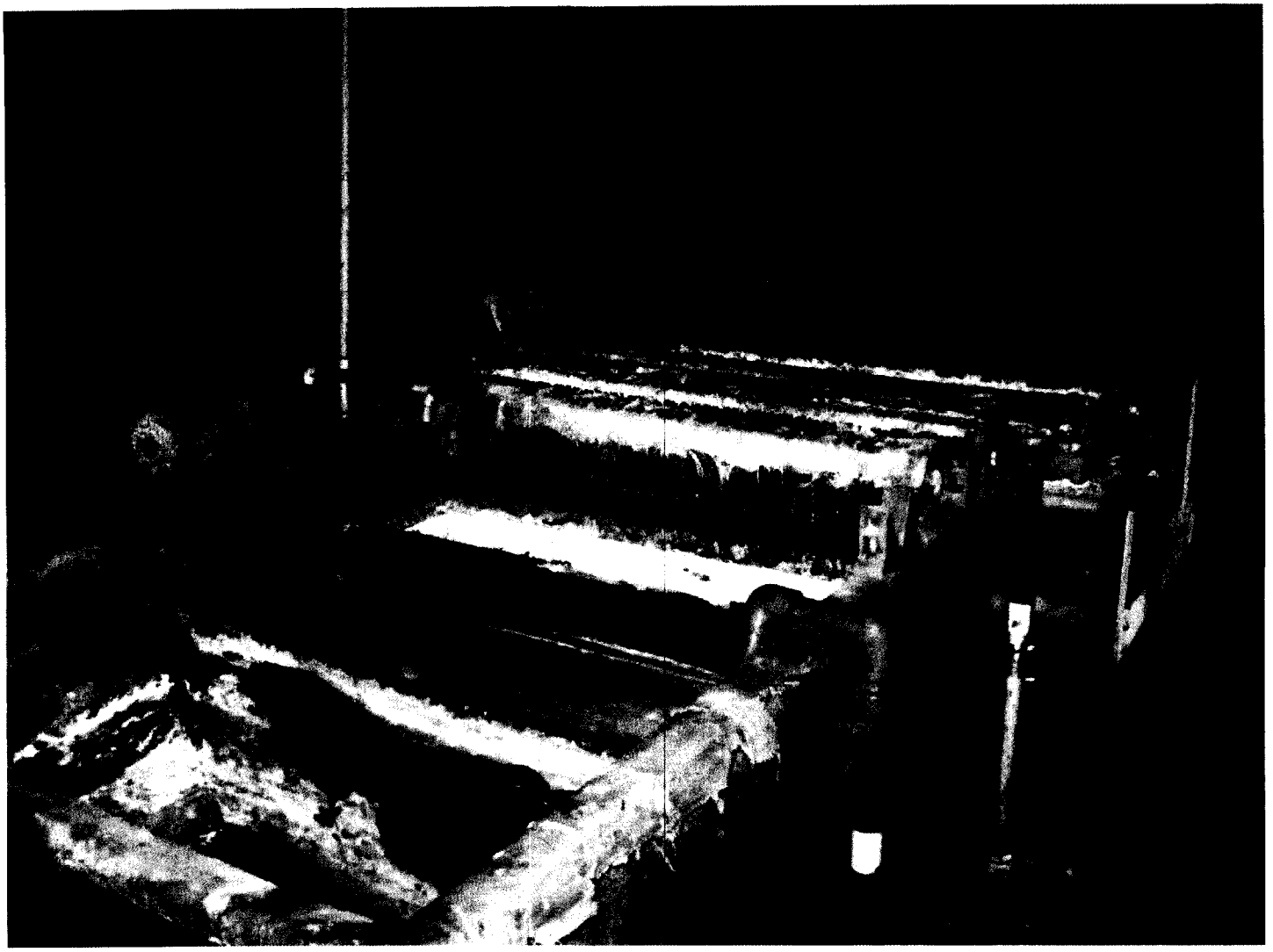
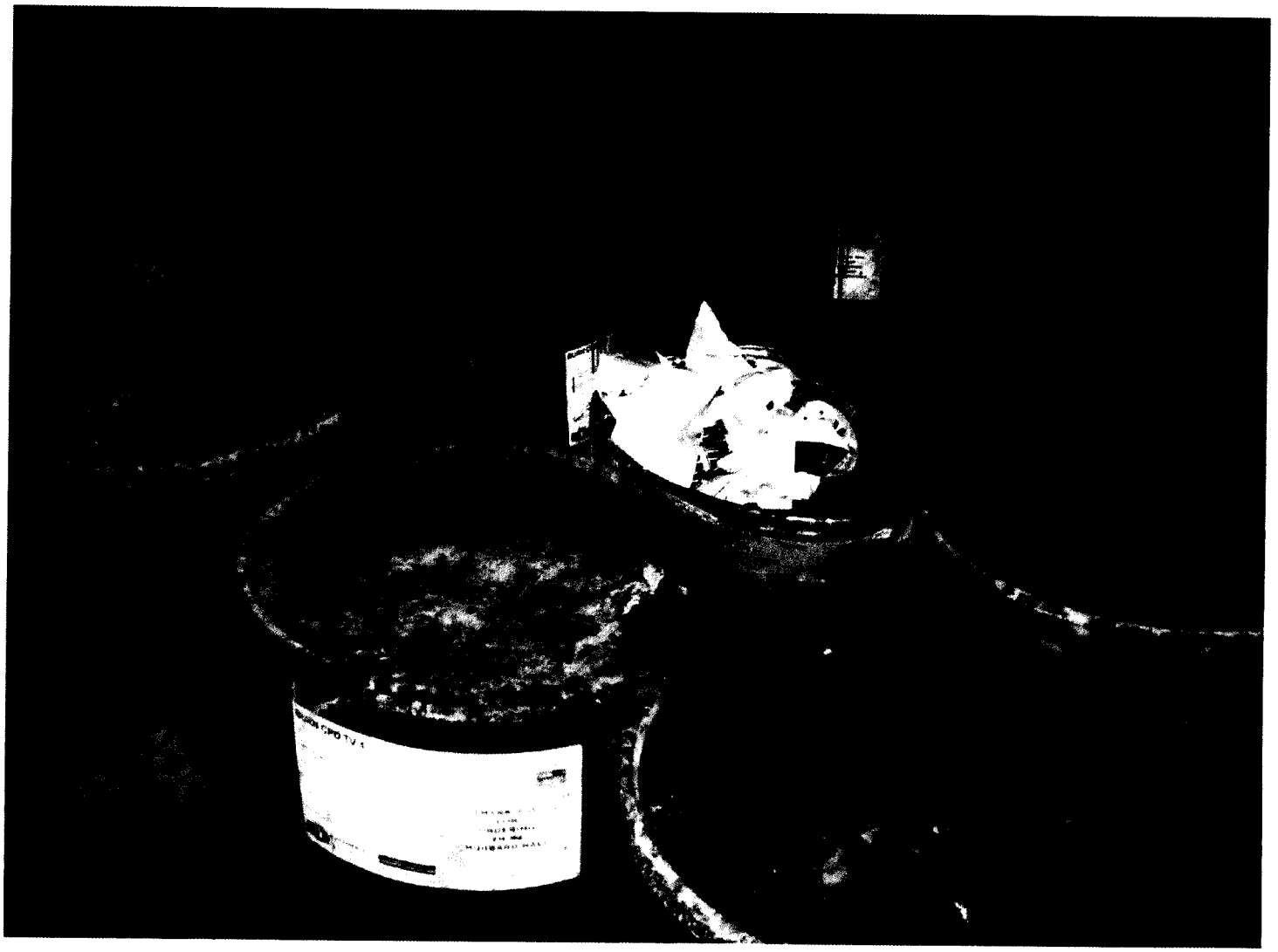
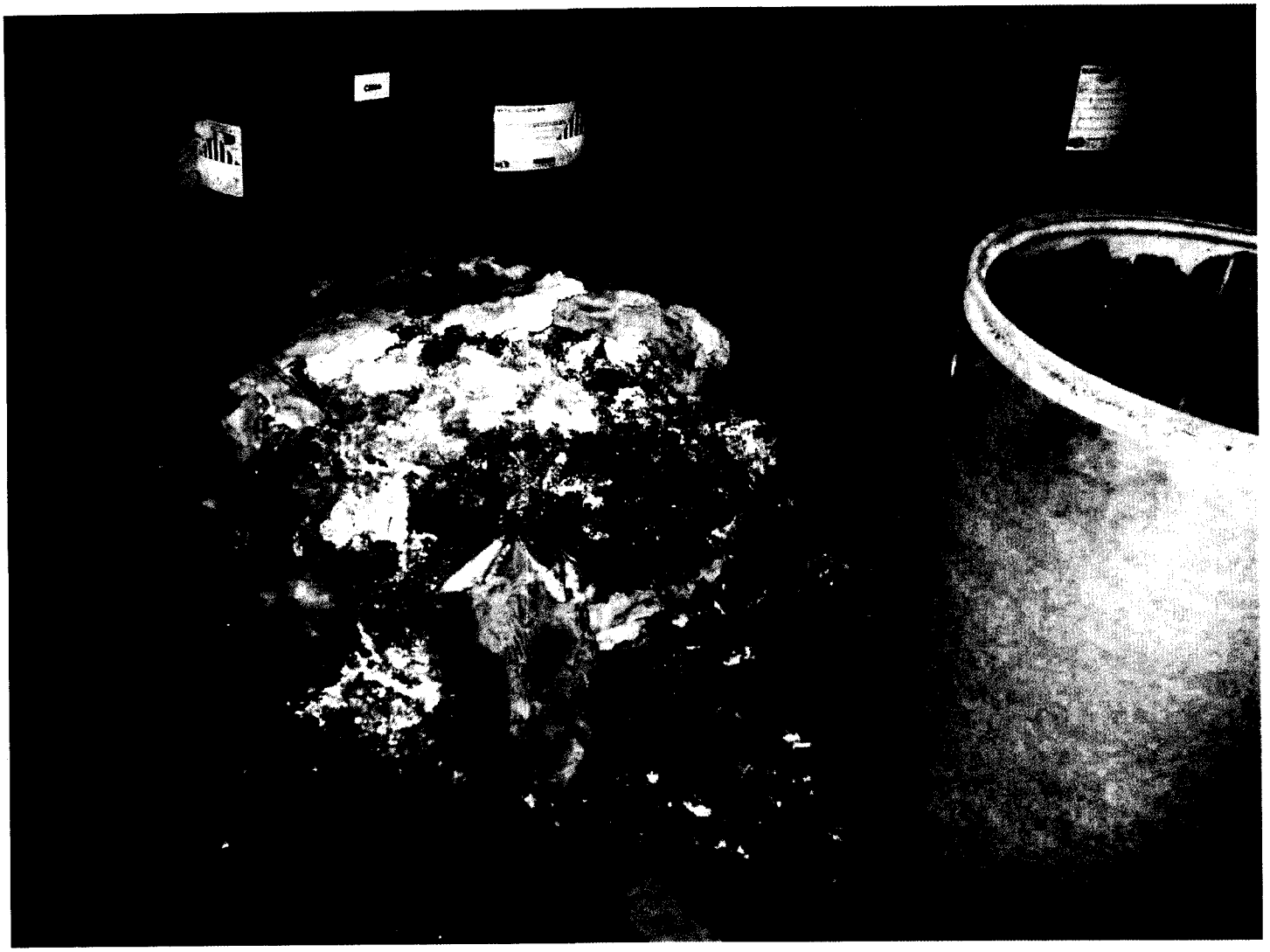

Soda Beads
CORROSIVE

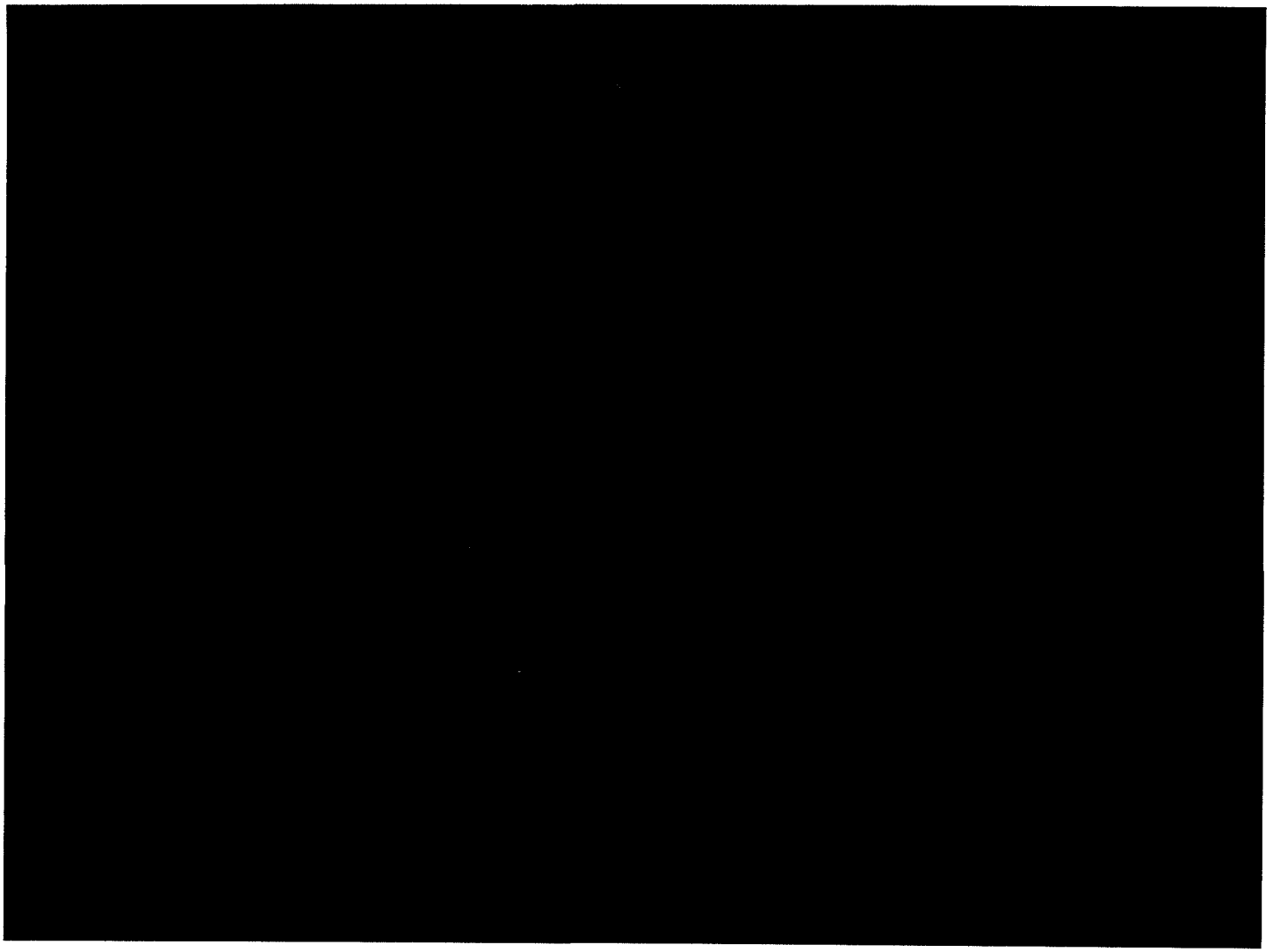


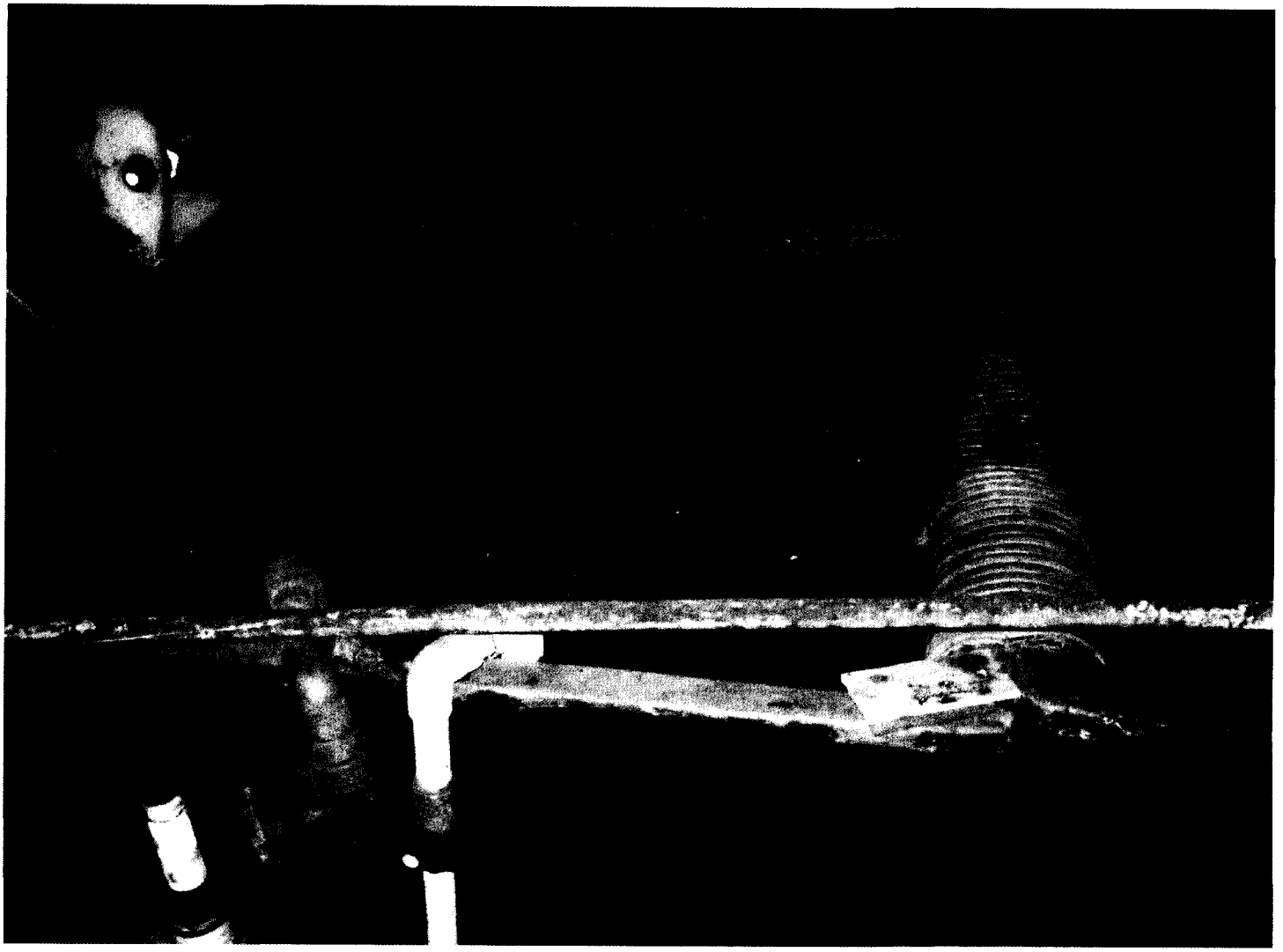


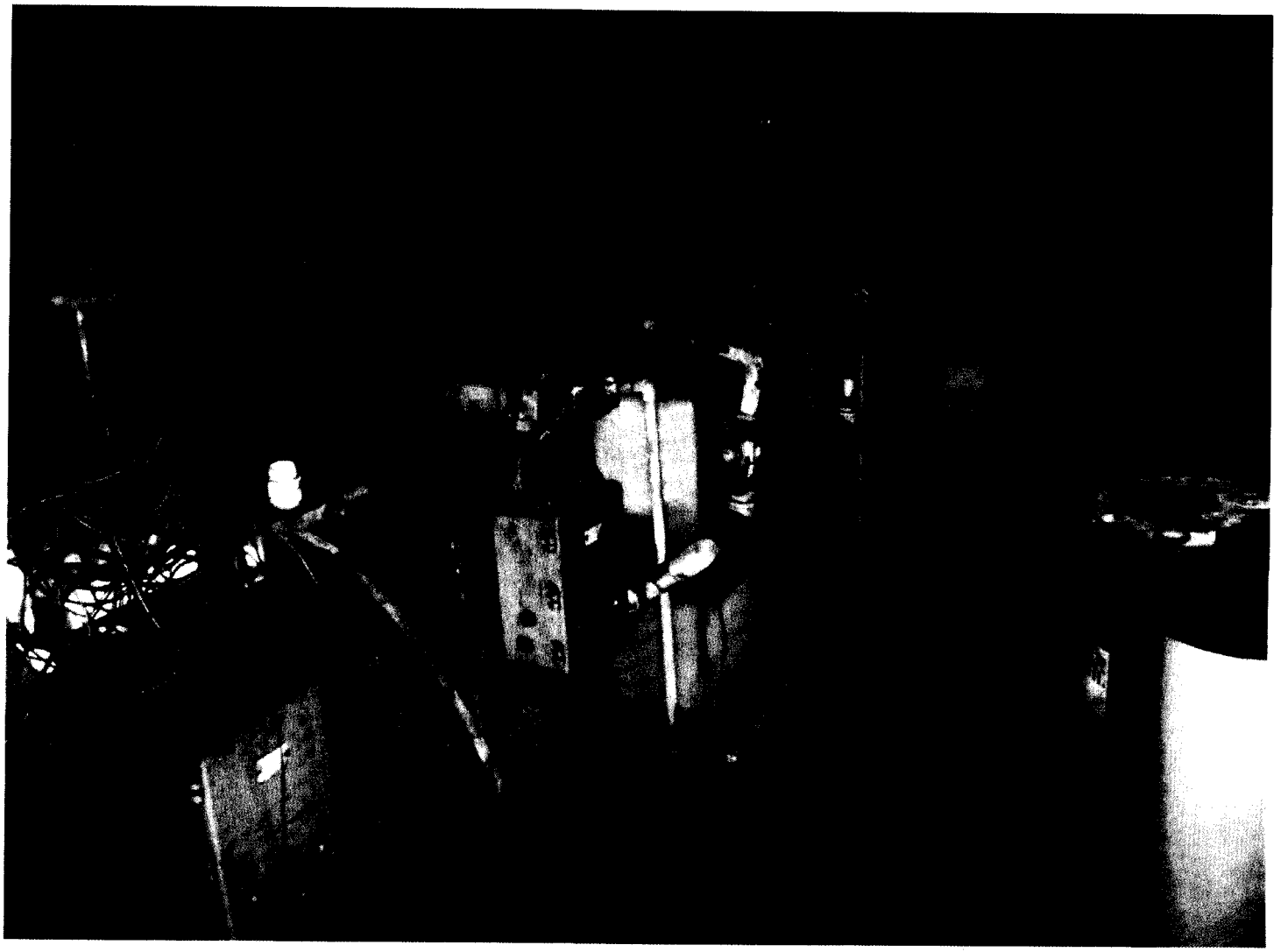


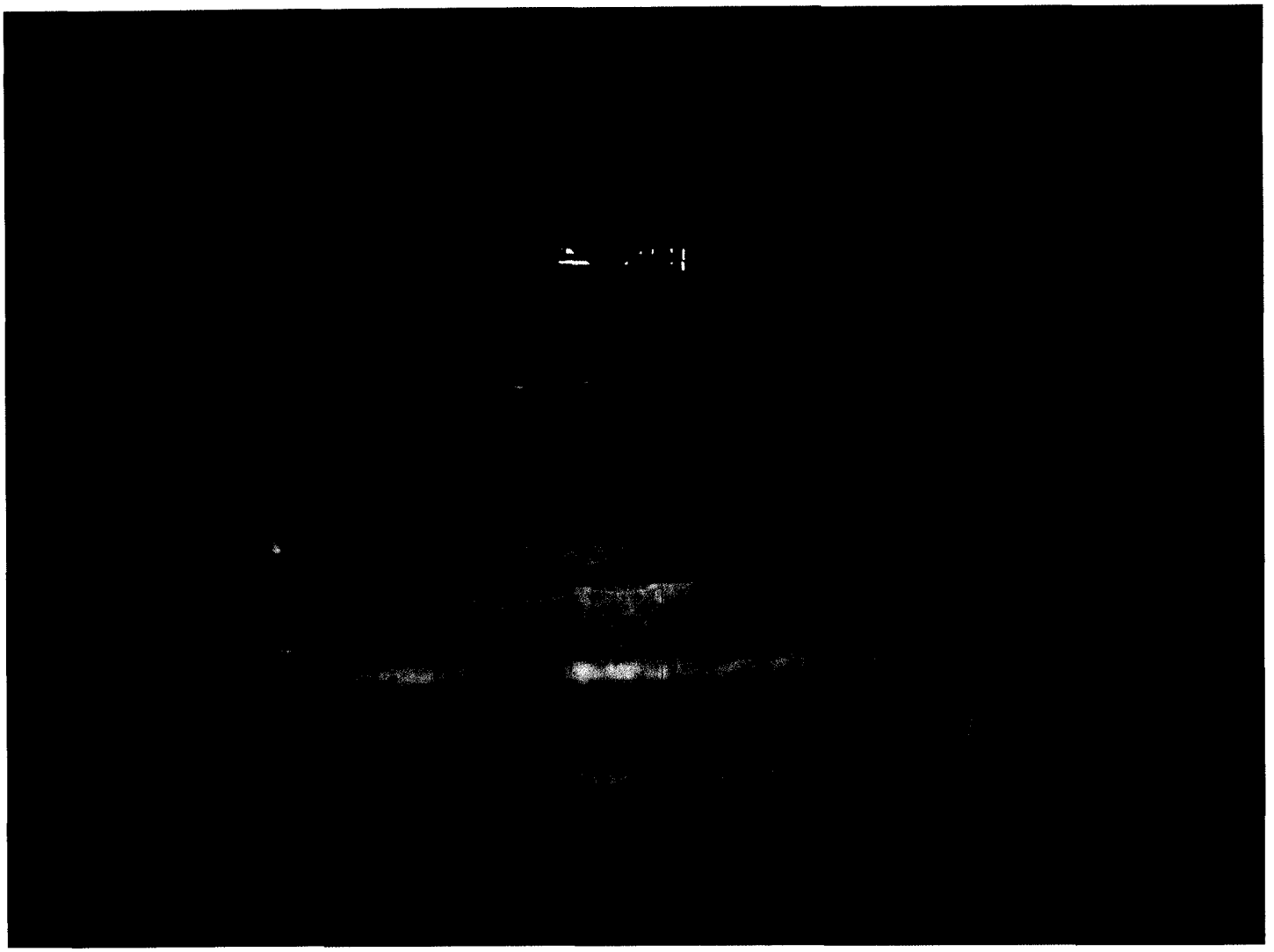


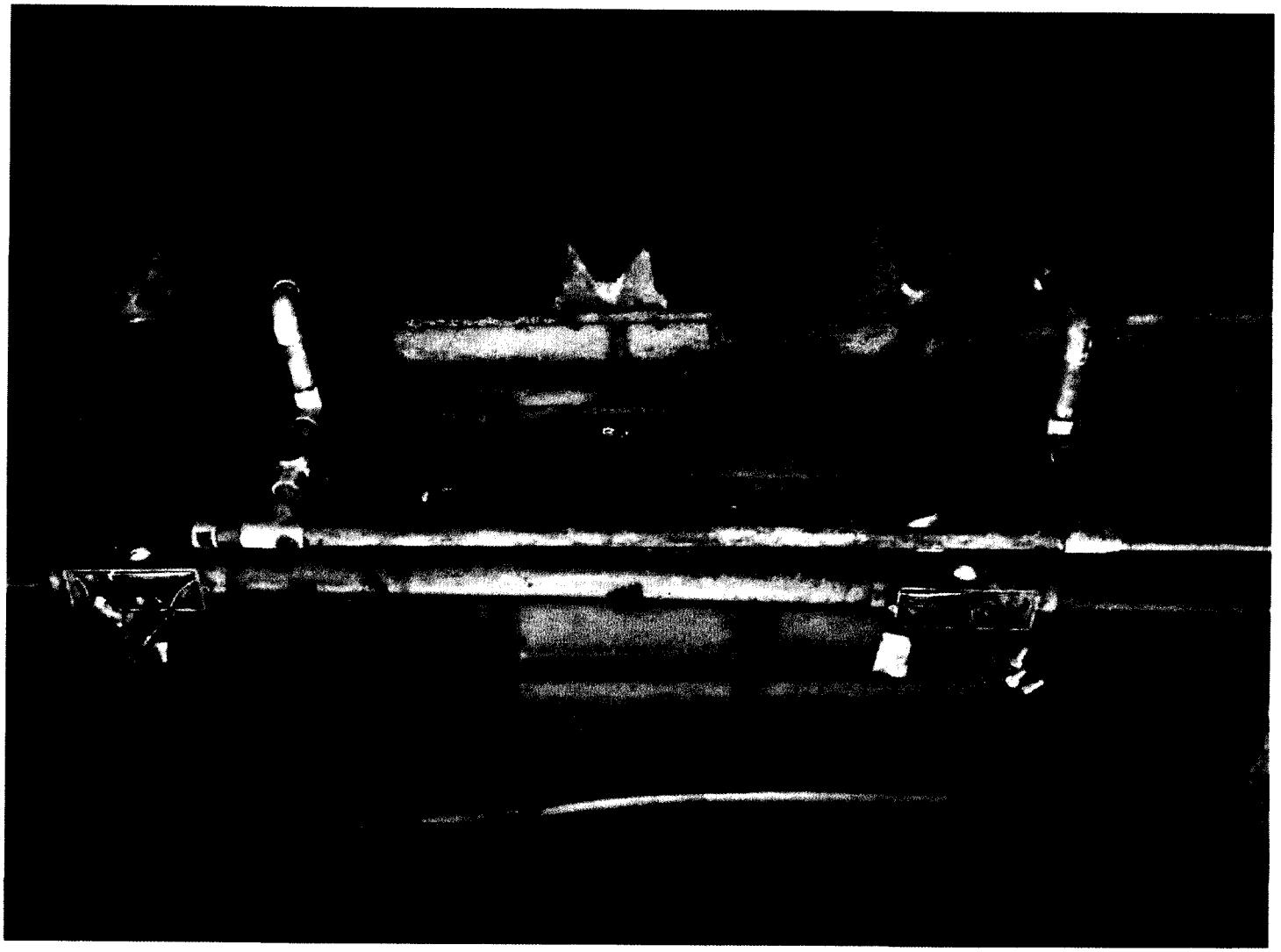


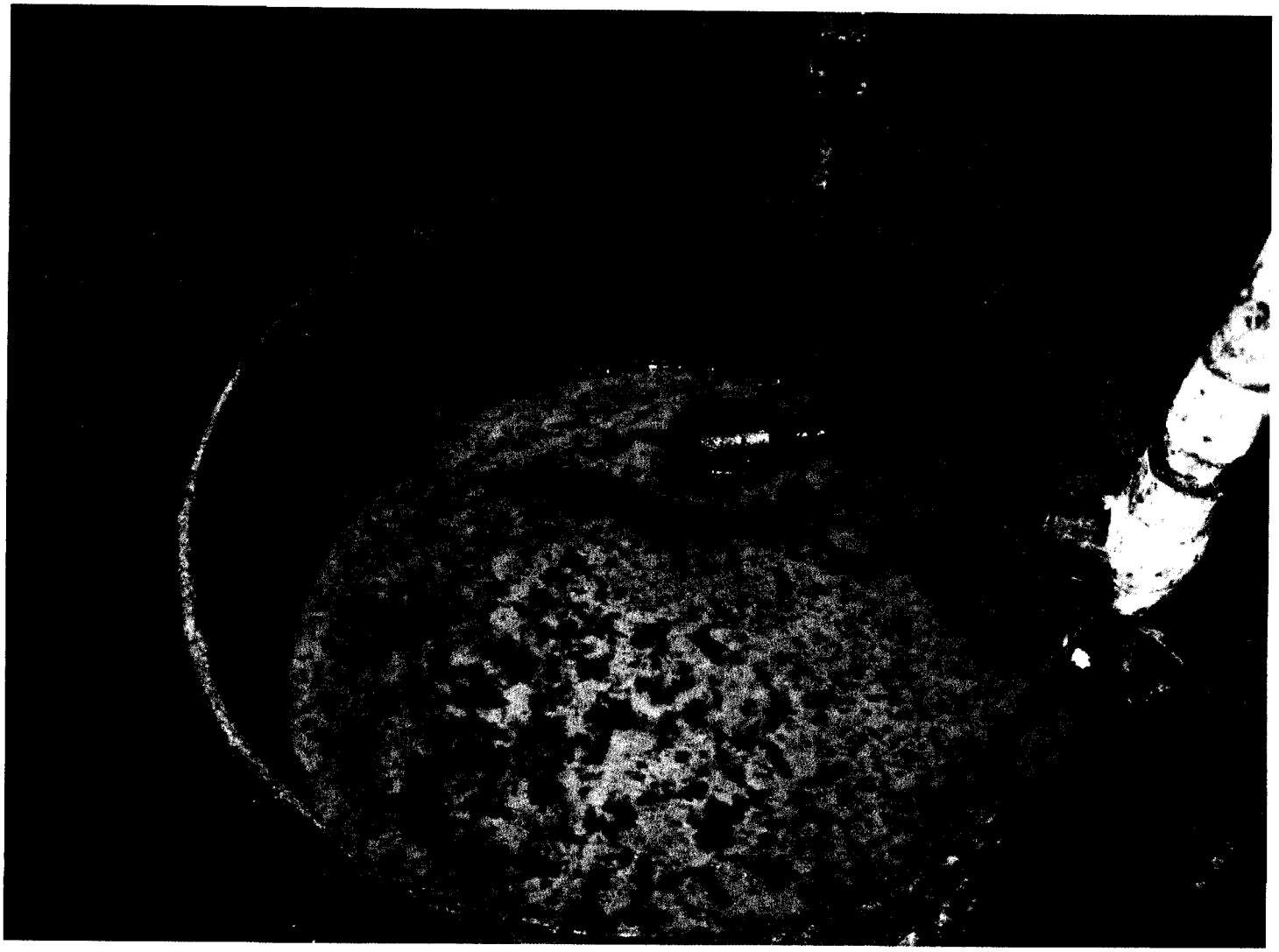


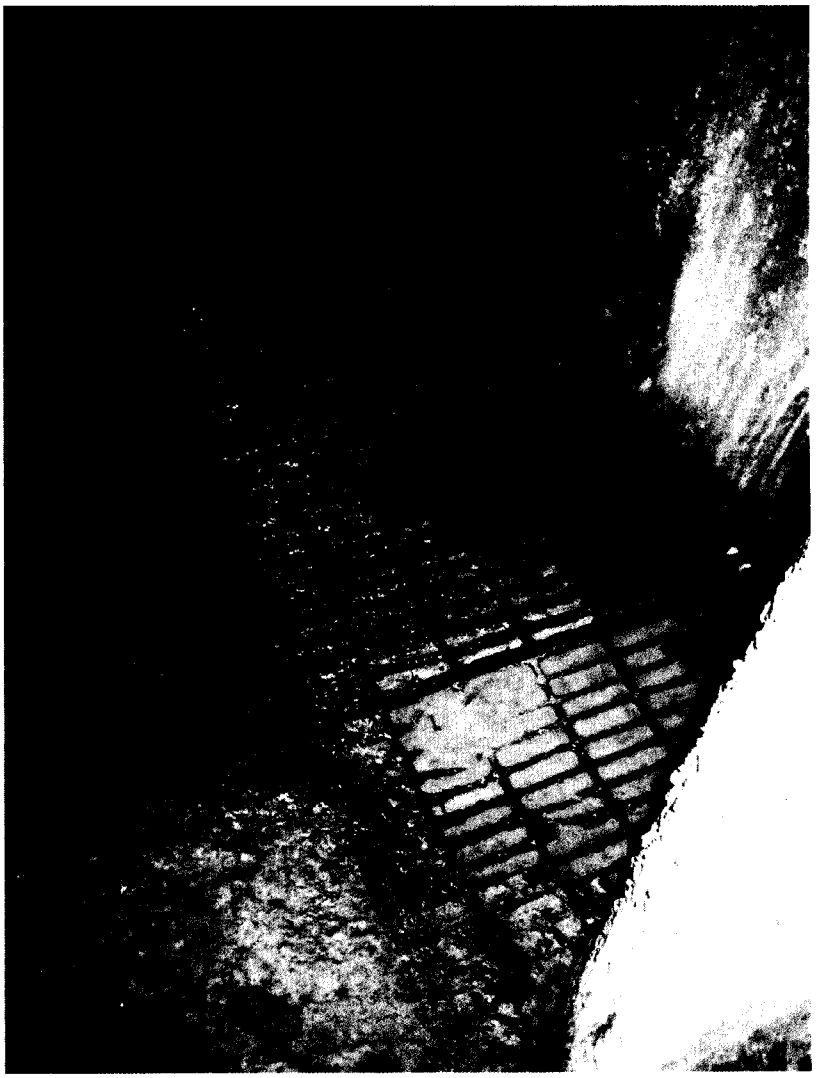


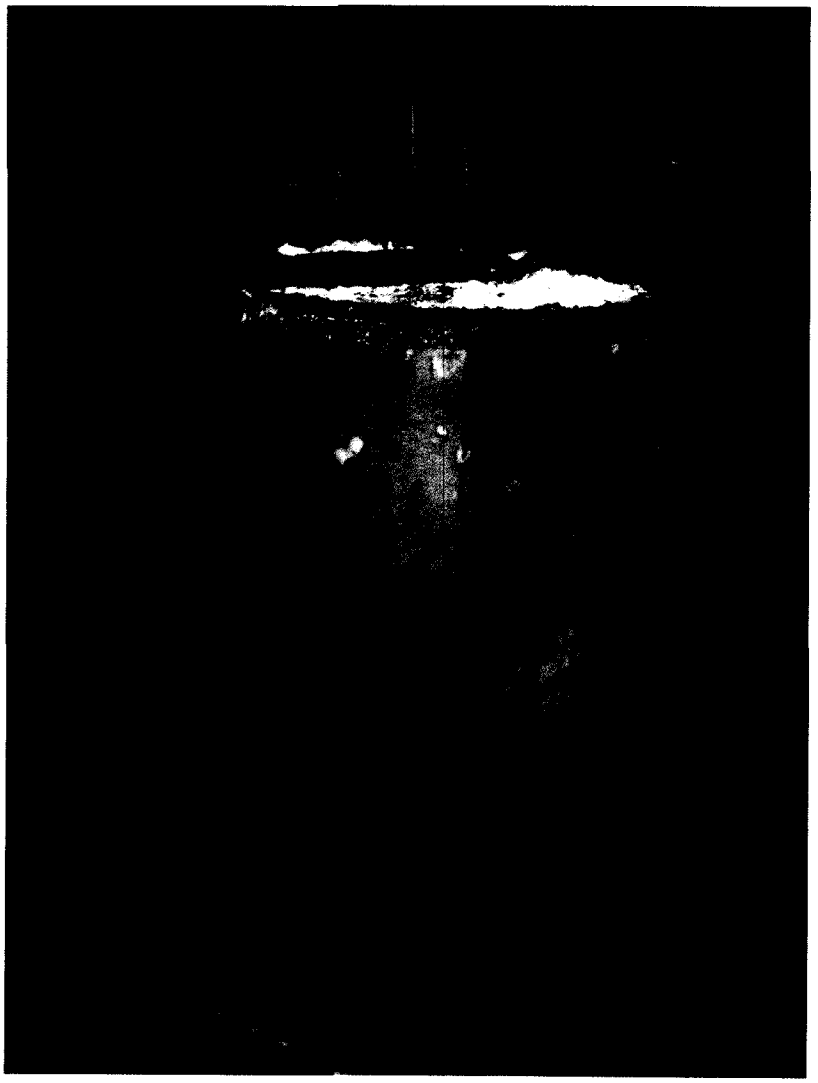


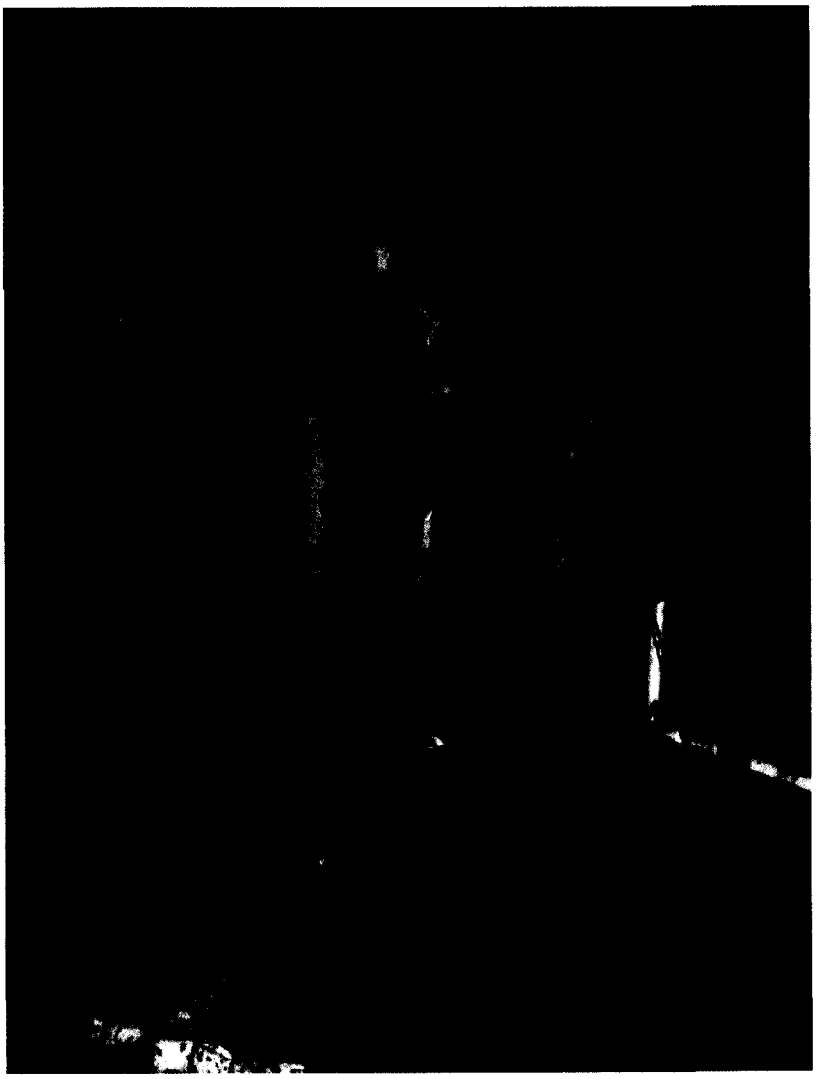


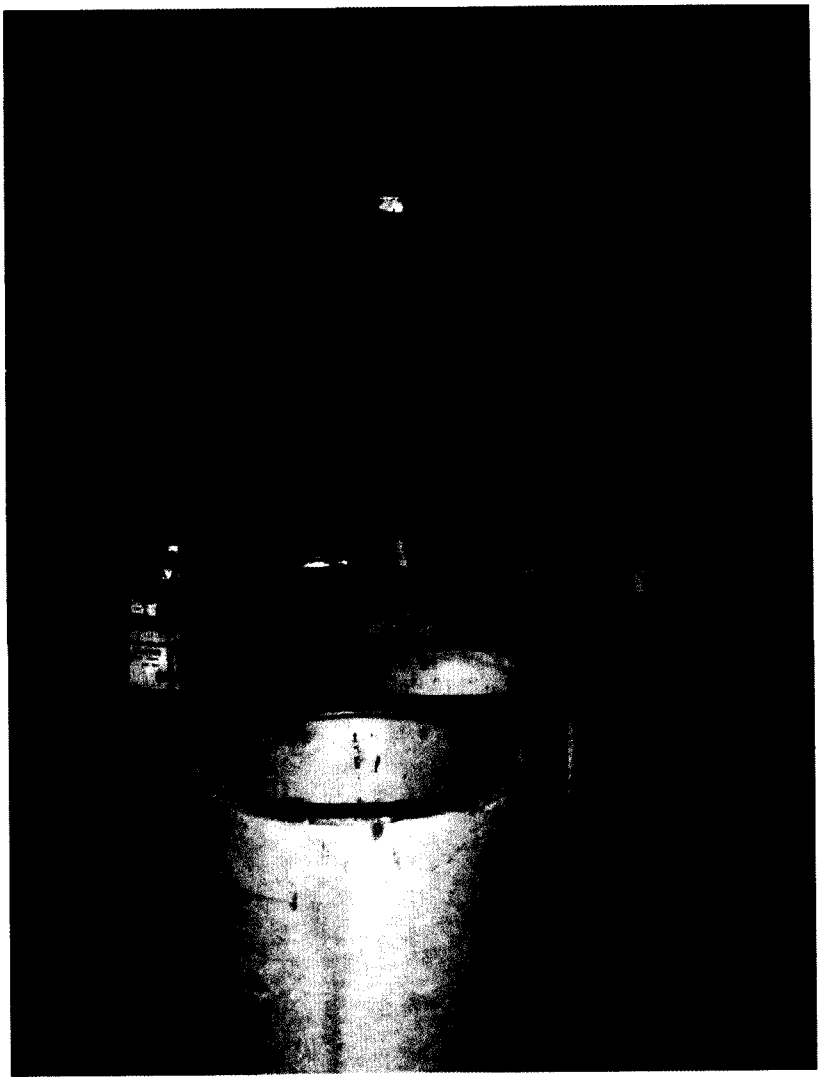


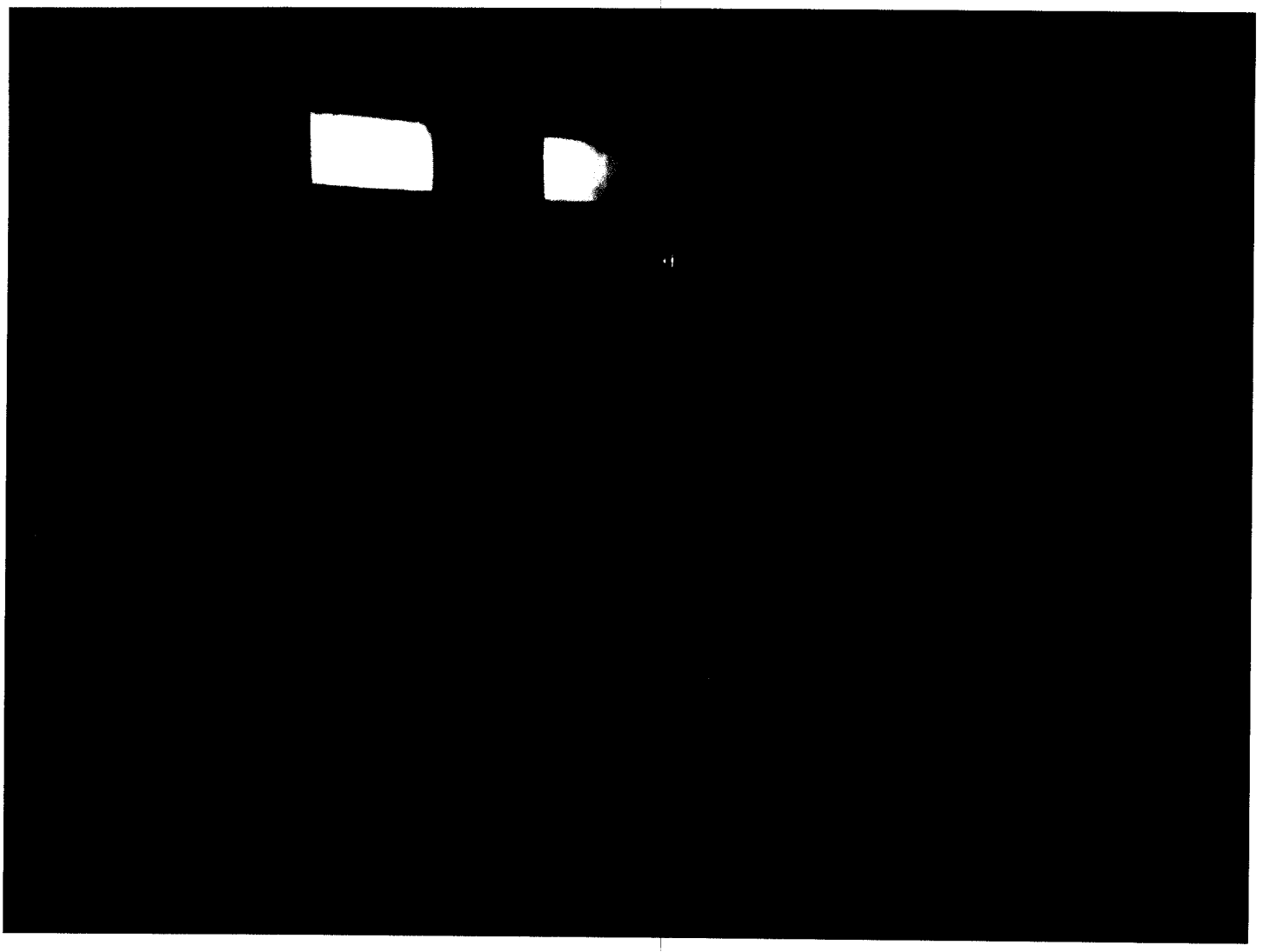


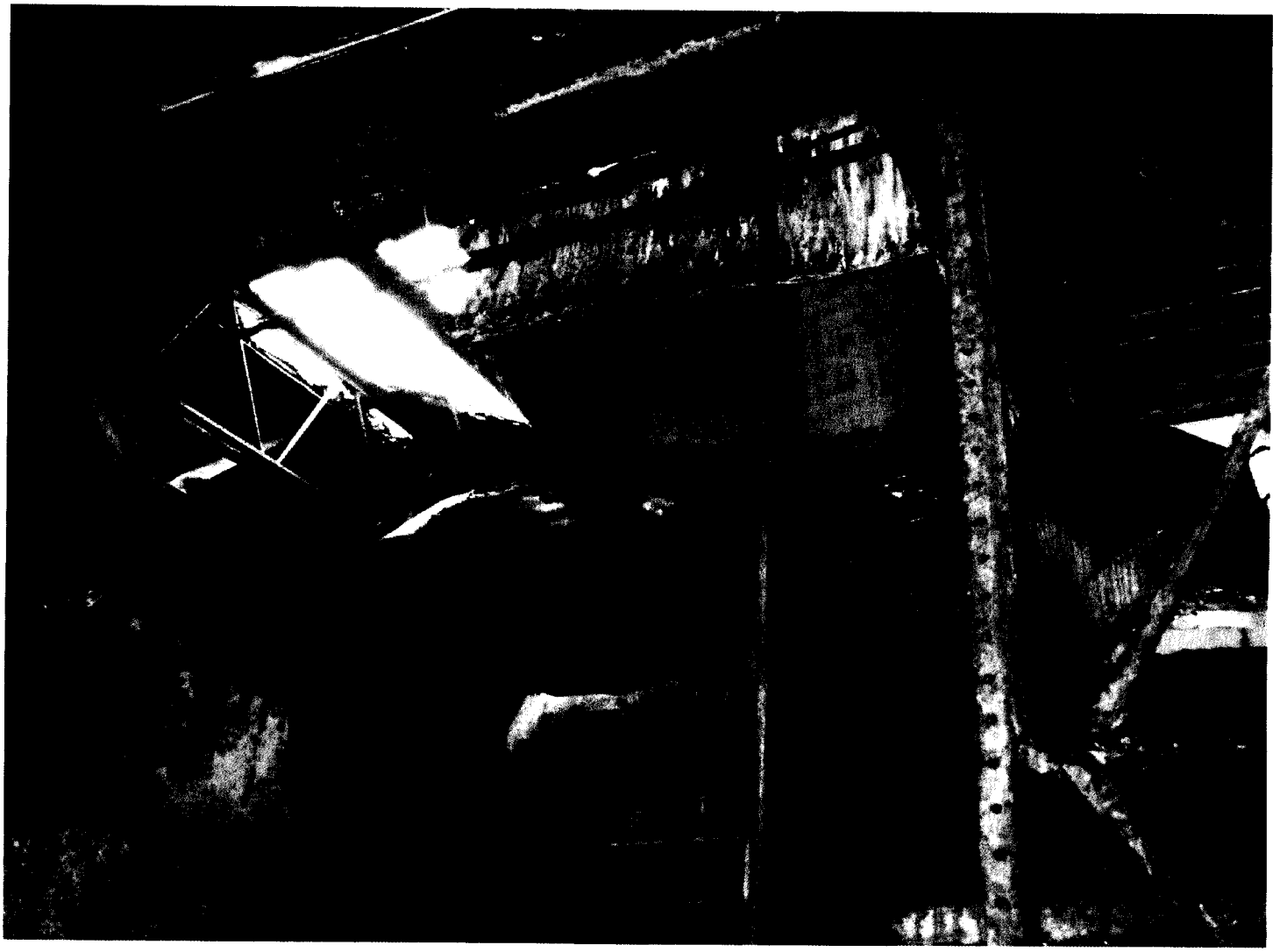


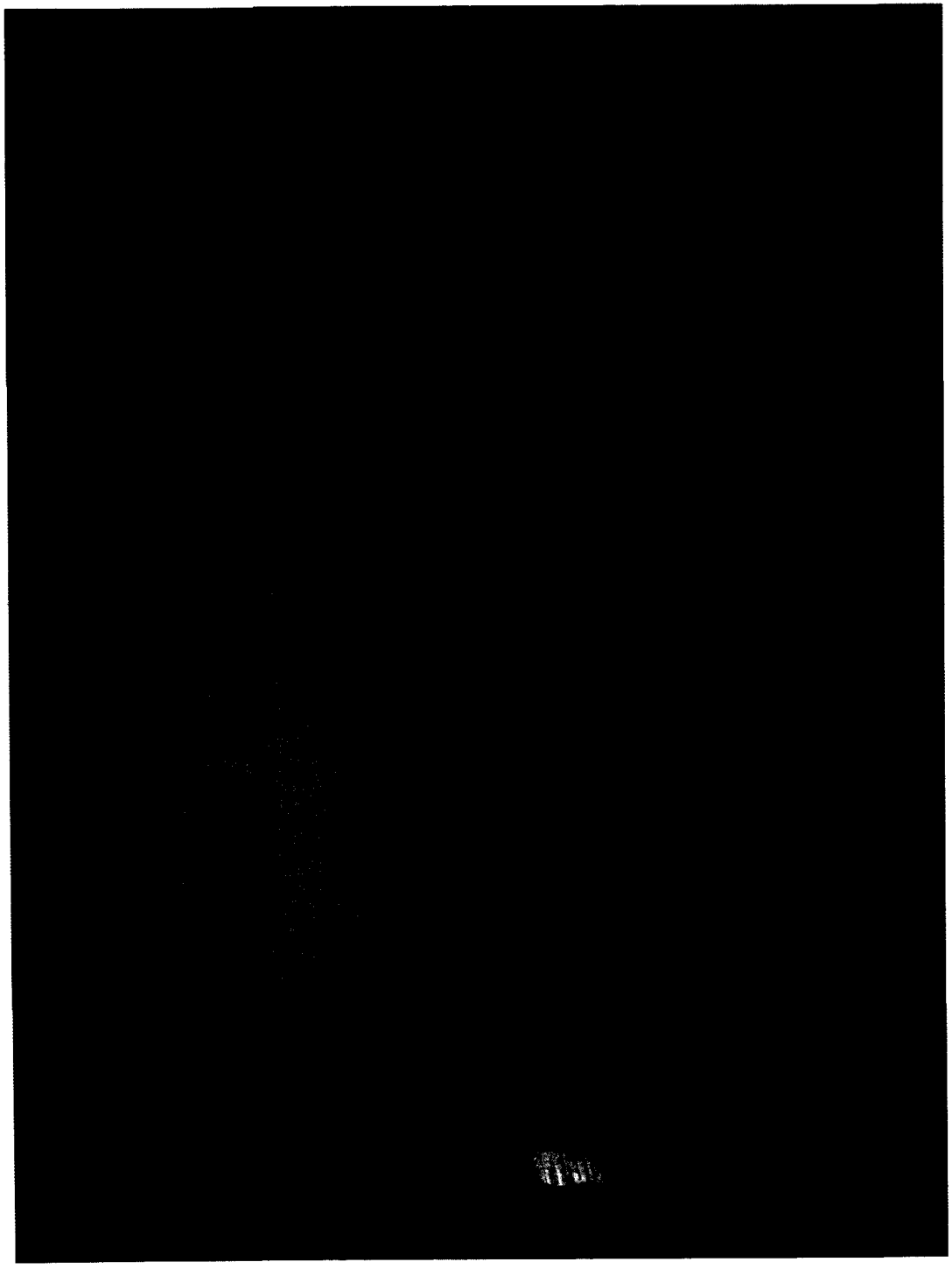


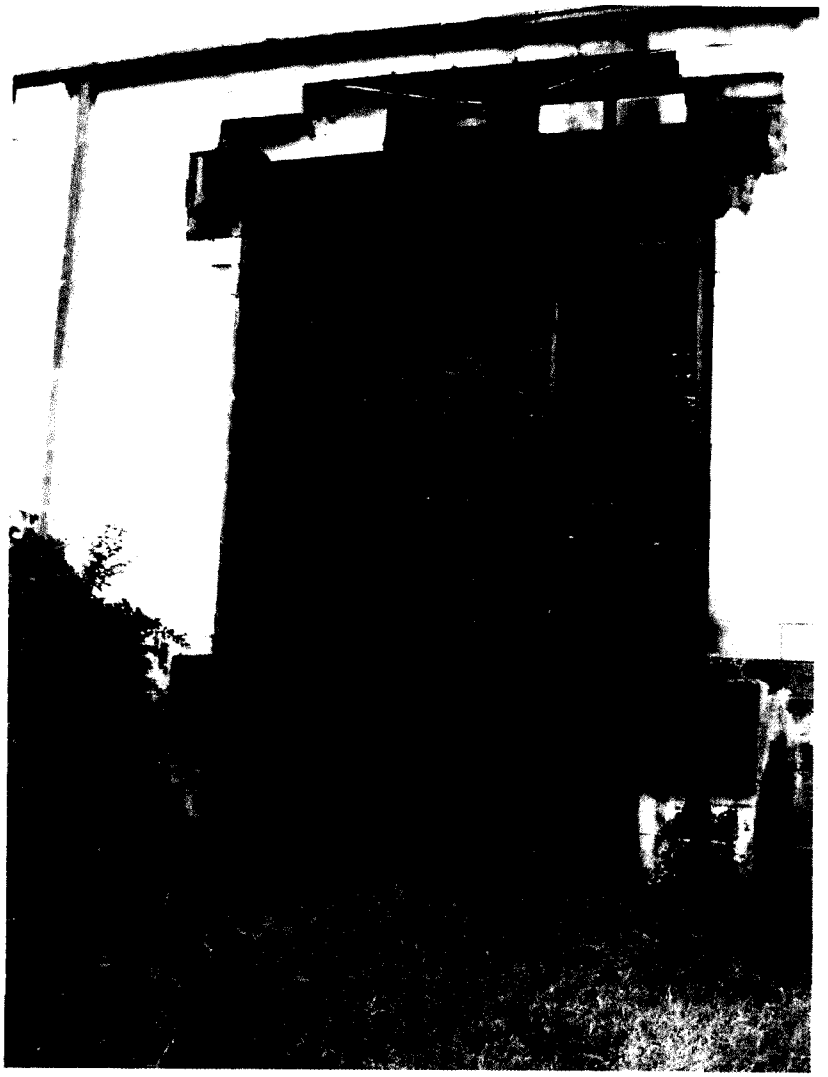










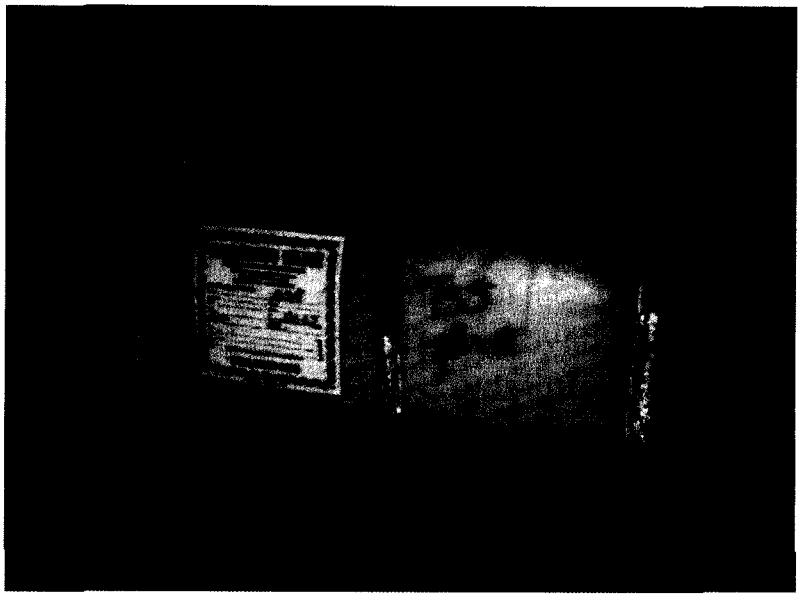


American Screw and Rivet
EPA emergency removal action

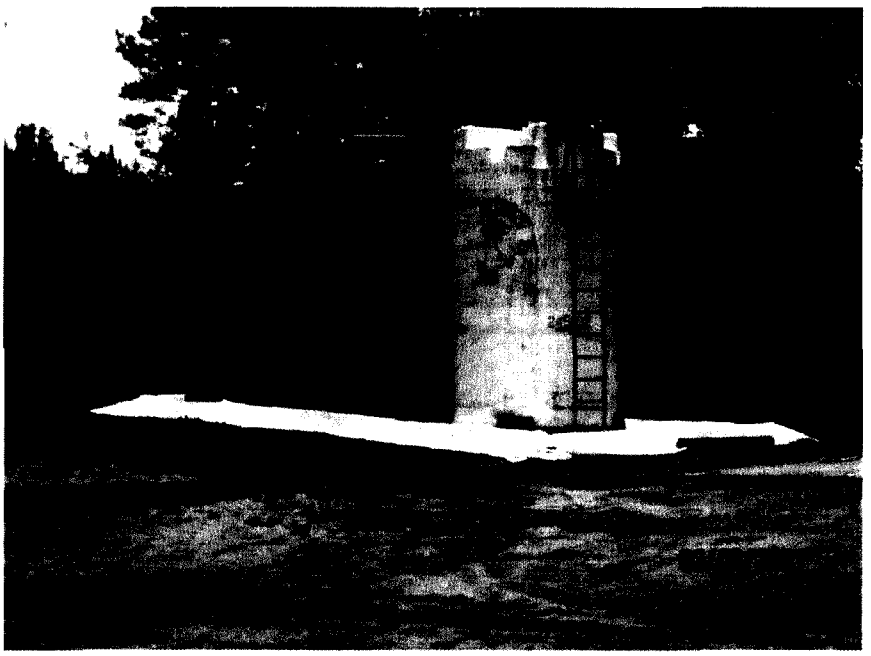
6/3/11 EPA OSC arrives on site with contractor OTIE to begin site survey and assessment. Verify number of waste totes and drums on exterior of building. Contractors don level B PPE and enter building to check atmosphere (FID/PID, 4 gas meter) – one area of elevated O2 (21.5%) – all cleared for volume assessment. OSC begins ordering structurally sound containers for bulking of like waste. OTIE begins pH assessment of waste on exterior (ranges from 3-11 – approximately 250g totes). Second contractor, ER, arrives on site before end of the day.

6/4/11 Bay doors of facility have been opened to allow light and better ventilation before assessment begins. Main path on floor cleared for better inspection and to remove layer of waste. OTIE begins pH assessment of totes on interior, approx 81. Baker tanks arrive onsite and ER obtains vac truck to begin consolidating waste with ph ranging from 8-11.

6/5/11 Assessment of totes on interior of building continues (all those labeled with Hazardous waste label D002 pH verified as 2). Pumping and consolidation of waste on exterior of building continues.

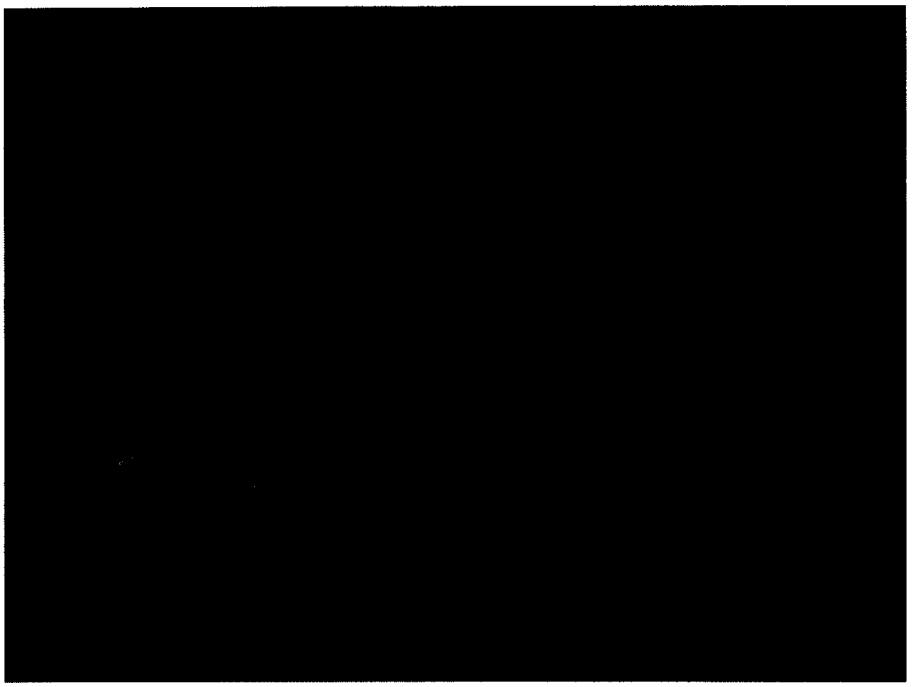


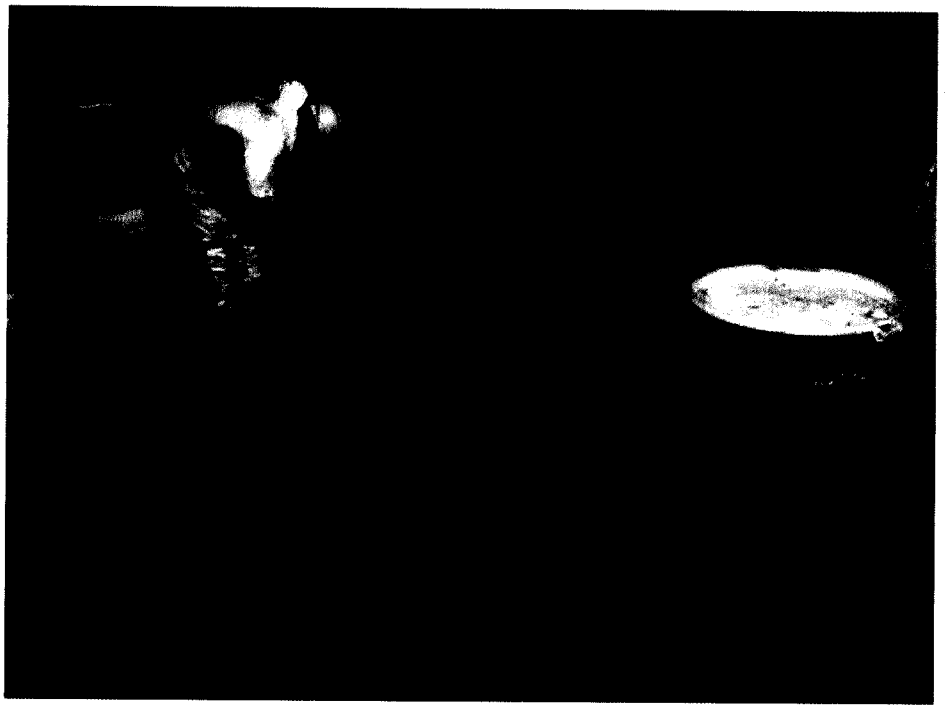
6/6/11 Assessment of totes on interior of building continues. Poly tanks arrive onsite to begin consolidation of pH 2 Hazardous waste.



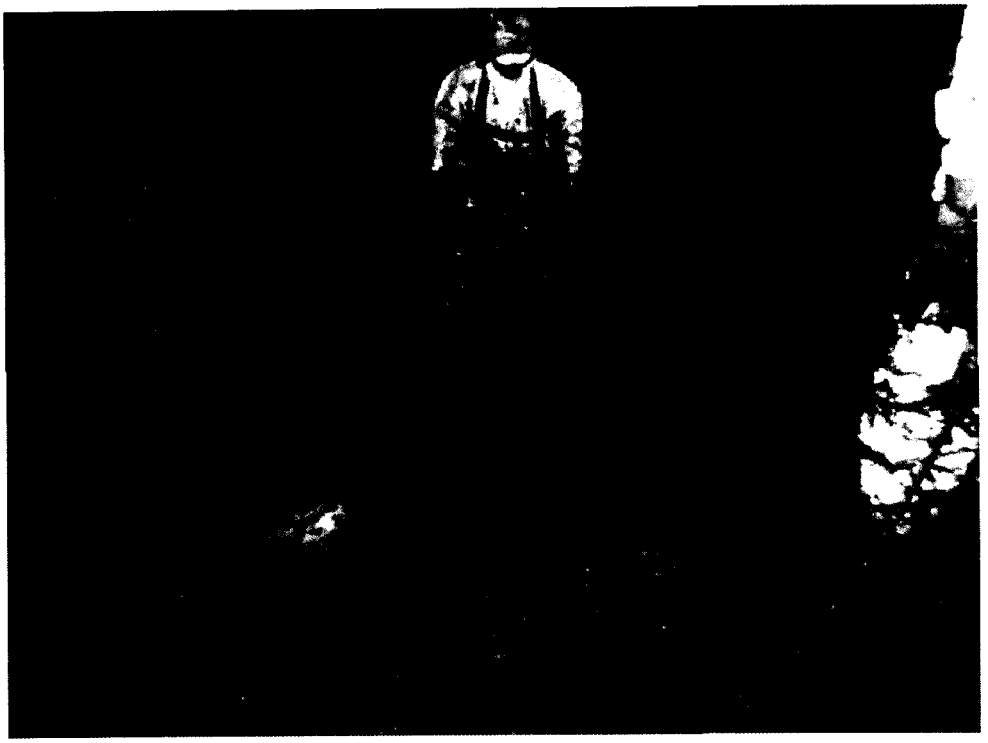
6/7/11 OTIE continues hazardous characterization of waste. EPA OSC begins further evaluation of overflowing sumps (5) in the building for clean out of waste material (liquid pH 9-10). Regional office has discussions with EPA criminal investigator. ER continues with waste consolidation. Region discusses with EPA OSC the additional AS & R site at 1 American Way, Anderson.

6/8/11 ER continues with waste consolidation, fourth poly tank arrives and is filled – still some 25+ totes remain, next tank on back order (1rst pic some totes have been removed). Sludge box arrives on site and ER begins addressing overflowing sumps.

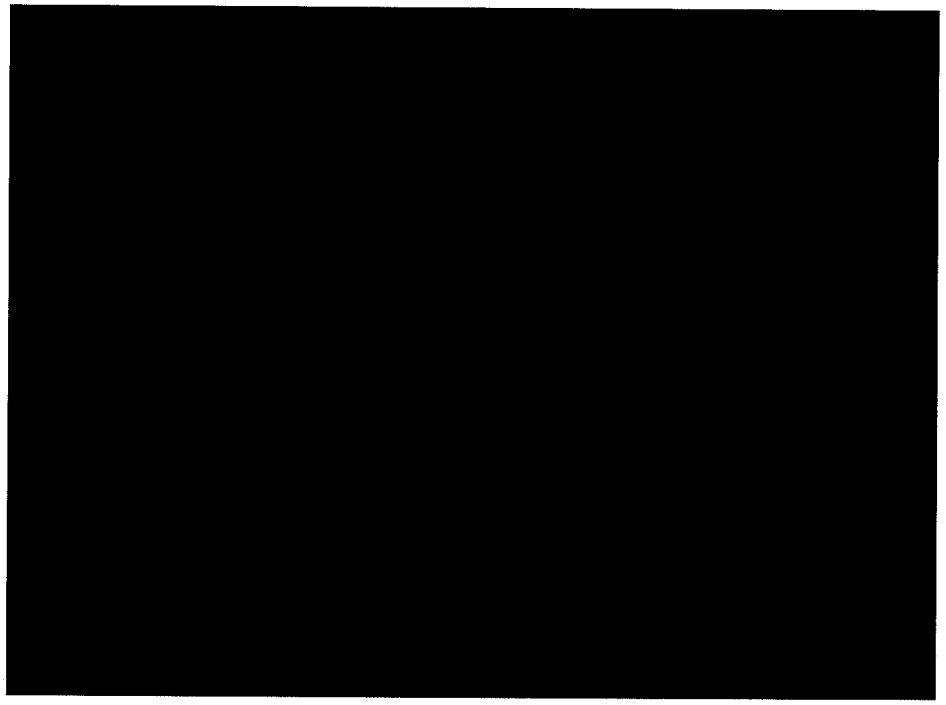


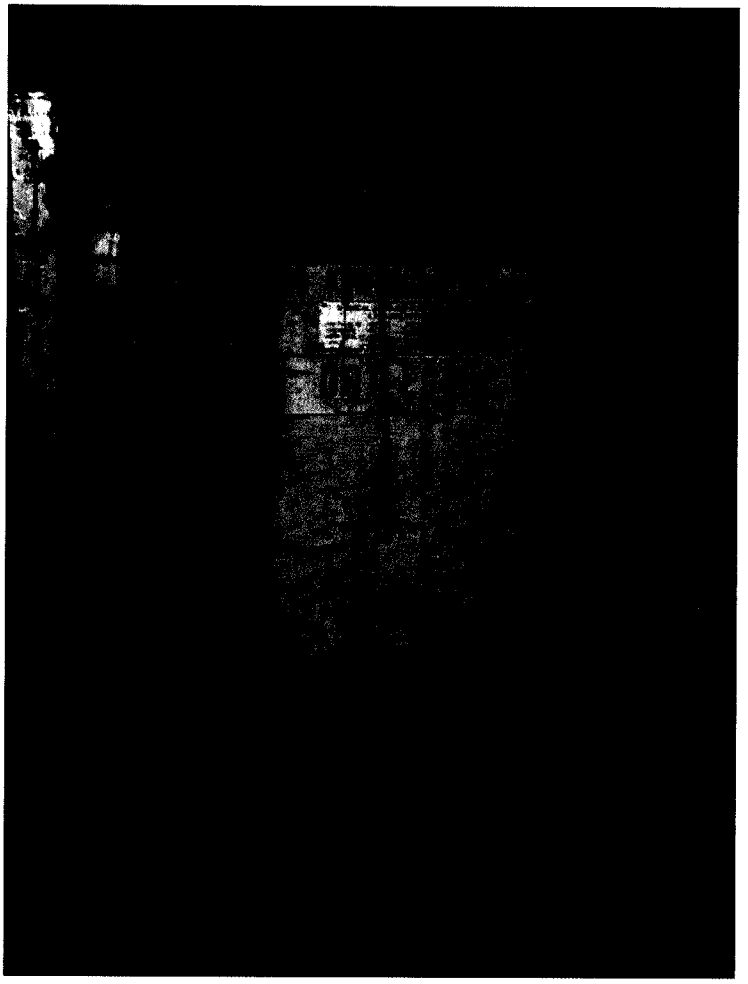


6/9/11 OTIE monitors atmosphere during sump clean out. Second sludge box arrives onsite for use and removal continues. First two of sumps cleaned out. EPA OSC meets representative of bankruptcy trustee at AS & R 1 American Way site for walk through. Site in stabile condition (same as last fall), but there are some waste issues there to address. EPA lawyers to discuss with bankruptcy trustee and develop a plan for upcoming week.



(below – 1 American Way waste)





Summary as of 6/9/11:

1. 11,000 gallons waste water (ph ~ 10) consolidated in Baker tank
2. 20,000 gallons D002 Hazardous Waste consolidated in Poly tanks
3. 2 sludge boxes, approximate total volume of 26 cubic yards removed from sumps.

Remaining to address at Manse Jolly site

* Liquid in 2 both lines
* Two small sumps on large one
* 25+ totes of D002 HW
* 5+ totes of ph 8-10 WW
* Various 55 gallon drums and 15 – 30 gallon drum *
* 1 internal sludge drying bed and paper drums of similar material
* 3 external sludge-drying vaults (large)
* Additional environmental samples

Anderson County Property Viewer

1190017020 (Parcels)

Roads

Highways

Parcels

Lakes

Municipal Boundaries

SC Counties

2005 Aerial Photography

Red: Band_1

Green: Band_2

Blue: Band_3

1190017020 (Parcels) 1494642.925, 1007573.799 (1)

1190017020 (Parcels) (1)

OBJECTID	PID	TMS	OWNER	OWNER_ADDR	CITY	ZIPCODE	TAX_DIST	TAX_NEIGH	DBOOK	DPAGE	PARENT	DIMENSIONS	DESCRIPTIO	PHYS_ADDR	SALE_YEAR	SALE_PRICE	PREV_OWNER	MRKT_VALUE	Shape.area	Shape.len	Display Field
11912	1190017020	1190017020	STEIN ROBERT WILLIAM ET AL	PO BOX 5531	ANDERSON SC	296235531	4	100	20R	544	0	F 000000 00000 PP 025/00101	MANSE JOLLY RD	1625 MANSE JOLLY RD	1986	10	STEIN WILLIAM L SR ET AL	183540	152403.244619	1681.890702	1190017020

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#1

Reconciliation Pending

Itemized Cost Summary

AMERICAN SCREW & RIVET, ANDERSON, SC SITE ID = B4 J8

Costs from 10/01/1980 to 06/05/2017

REGIONAL PAYROLL COSTS	$65,604.45
REGIONAL TRAVEL COSTS	$9,506.33
ENFORCEMENT SUPPORT SERVICES	
TOEROEK ASSOC., INC. (EPS40903)	$27,632.11
ERRS WITHOUT AA RATE	
ENVIRONMENTAL RESTORATION, LLC (EPS40704)	$877,151.34
OTHER EXPENDITURES	
Q SOLUTIONS (EPS41101)	$738.29
S/F TECH ASSESSMENT & REPONSES TEAM (START II)	
ONEIDA TOTAL INTEGRATED ENTERPR LLC (EPW05053)	$141,708.49
EPA INDIRECT COSTS	$601,940.55
TOTAL SITE COSTS BEFORE COST RECOVERY COLLECTIONS	$1,724,281.56
COLLECTIONS/ADJUSTMENTS	($7,442.51)
Total Site Costs:	$1,716,839.05

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #1**
Initial POLREP
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To:
From: Jose Negron, On Scene Coordinator
Date: 6/5/2011
Reporting Period: 6/3/2011 TO 6/4/2011

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/4/2011
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency response

1.1.2 Site Description

The site of the former American Screw and Rivet. The site contains a one story building were the company
manufactured steel screws and rivets. The site is on the outskirts of the City of Anderson and sits in a wooded area surrounded by residences and light indudtrial facilities.

1.1.2.1 Location

1625 Manse Jolly Road in Anderson, Anderson County, South Carolina.

1.1.2.2 Description of Threat

Site contains poly tanks, drums and other containers some of which are exposed to the elements and show evidence of structural degradation. Some containers are leaking why others have spilled their contents. The roof is badly deteriorated and rain drains into the interior of the building through ruptured areas and other apertures. Totes and drums are found exposed to the elements and without any containment. Evidence of spilled materials are present throughout the interior of building and evidence of uncontrolled migration onto the environment is present. The site drains towards a pond that sits on the property and is part of the drainage basin for Lake Hartwell.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Approximately 250 containers including poly totes, drums, cardboard drums and containers, bags pails and others have been identified. Preliminary hazardous categorization analysis has revealed flammable and corrosive liquids. Approximately 44 poly totes containing unknown liquids with a pH ranges between 9 and 10 have been identified. Another 30 totes contain unknown liquids with a pH of 2 have been identified.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential uncontrolled releases.

2.1.2 Response Actions to Date

Approximately 250 containers including poly totes, drums, cardboard drums and containers, bags pails and others have been identified. Preliminary hazardous categorization analysis has revealed flammable and corrosive liquids. Approximately 44 poly totes containing unknown liquids with a pH ranges between 9 and 10 have been identified. Another 30 totes contain unknown liquids with a pH of 2 have been identified. ERRS has deployed frac tanks and vaccum trucks to bulk liquids. Thus far approximately 40 totes with volumes ranging between 250 to 330 gallons have been consolidated into one frac tank. Additional tanks capable of holding corrosive pH 2 liquids will be deployed. ERRS has completed partial removal of spilled materials from the floor of the building.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continue. EPA has been in contact with the trustees and owners and has secured access from both.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
pH 9/10 liquids	liquids	10000 gallons			

ph 2 liquids	liquids				
unknowns	various	unknown			

2.2 Planning Section

2.2.1 Anticipated Activities

START will continue to conduct hazardous categorization and segregation of waste streams/
START to develop soil sampling plan
START to develop sampling plan for sedimentation ponds

2.2.1.1 Planned Response Activities

ERRS will continue to segregate and consolidate waste streams from compromised containers.
Continue to remove liquids from floor
Remove sludge from three sumps to create storage capacity to prevent migration of contaminants into the environment
Transfer ph 2 liquids from poly totes to lined frac tanks.

2.2.1.2 Next Steps

Collect samples from soil and sedimentation ponds.
Submit samples to laboratory for waste stream characterization

2.2.2 Issues

2.3 Logistics Section

2.4 Finance Section

2.5 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

EPA 1
START 2
ERRS 6

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #2**
Emergency response actions continue
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To:
From: Jose Negron, On Scene Coordinator
Date: 6/7/2011
Reporting Period: 6/4/2011 to 6/7/2011

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/4/2011
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency response

1.1.2 Site Description

The site of the former American Screw and Rivet. The site contains a one story building were the company
manufactured steel screws and rivets. The site is on the outskirts of the City of Anderson and sits in a wooded area surrounded by residences and light indudtrial facilities.

1.1.2.1 Location

1625 Manse Jolly Road in Anderson, Anderson County, South Carolina.

1.1.2.2 Description of Threat

Site contains poly tanks, drums and other containers some of which are exposed to the elements and show evidence of structural degradation. Some containers are leaking why others have spilled their contents. The roof is badly deteriorated and rain drains into the interior of the building through ruptured areas and other apertures. Totes and drums are found exposed to the elements and without any containment. Evidence of spilled materials are present throughout the interior of building and evidence of uncontrolled migration onto the environment is present. The site drains towards a pond that sits on the property and is part of the drainage basin for Lake Hartwell.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

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2.1.1 Narrative

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2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continue. EPA has been in contact with the trustees and owners and has secured access from both.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

~~pH 9/10 liquids~~ ph 2 liquids	~~liquids~~ liquids	~~10000 gallons~~			
unknowns	various	unknown			

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Continue to remove liquids from floor
Remove sludge from three sumps to create storage capacity to prevent migration of contaminants into the environment
Continue the transfer of ph 2 corrosive liquid waste from poly totes to poly frac tanks.

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Collect samples from soil and sedimentation ponds.
Submit samples to laboratory for waste stream characterization

2.2.2 Issues

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2.4 Finance Section

2.5 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

EPA 1
START 2
ERRS 6

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

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6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #3**
Emergency Response Action Continues
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To:
From: David Andrews, On Scene Coordinator
Date: 6/10/2011
Reporting Period:

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/4/2011
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

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2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential uncontrolled releases.

2.1.2 Response Actions to Date

Approimately 19,000 gallons of pH 2 liquid (hydrochloric acid 30%) has been consolidated into 4 poly-tanks within containment (poly-lined). Approximately 11,000-gallons of pH 10 liquid collected from sump-drains within the building has been bulk-consolidated into a fractional tank ("frac" tank). Three (3) vacuum-boxes have been filled with solid/sludge residues collected from four (4) sumps within the building. START has completed sample collection from containers within the building and from surface soil along a drainage path outside the building. START also conducted field-compatability tests on unknown/unidentified material in the building and worked with ERRS to develop preliminary waste streams that may be bulk consolidated for disposal pending further analytical testing.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continue. EPA has been in contact with the trustees and owners and has secured access from both.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

~~pH 9/10 liquids~~ ph 2 liquids	~~liquids~~ liquids	~~10000 gallons~~ 20,000			
Sump Waste	Sludge	10-15 cu yds			

2.2 Planning Section

2.2.1 Anticipated Activities

ERRS to initiate disposal coordination
START to continue to delineate site contamination and finalize waste stream identification.

2.2.1.1 Planned Response Activities

ERRS will transition from the Emergency Response phase early next week (week of June 12th) by completion of bulk-consolidation of the remaining pH 2 liquids and the other liquid and solid waste streams. Disposal coordination is currently in-progress.

2.2.1.2 Next Steps

START & ERRS are awaiting for the first laboratory data on samples collected during this ER. Submit additional samples for identification and to support disposal profile(s).

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.5 Safety Officer

EPA is the primary Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

EPA 1
START 2

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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10748581

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #4**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 6/20/2011
Reporting Period: 6/13/11 - 6/17/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/4/2011
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Former Manufacturing Facility.

1.1.2 Site Description

American Screw and Rivet (ASR) was a manufacturer of screws and rivets operating at the Site until late 2010. The Site was referred to ERRB in June of 2011 for a Removal Site Evaluation and due to the presence of high levels of hazardous materials unsecured and exposed to the environment; an Emergency Response was initiated at the Site on June 3, 2011.

1.1.2.1 Location

The Site is located at 1625 Manse Jolly Rd., Anderson, SC. The area surrounding the Site is a mixture of light industrial, woods, and residences. There is also a small pond that receives the drainage from the facility.

1.1.2.2 Description of Threat

For a description of threat, please refer to previous POLREPs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

For details of the removal assessment, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS removed the sludge cake bed from one sump and pumped out two additional sumps.
- ERRS vacuumed approximately 3,000 gals of pH-10 liquid from the former line operation vats.
- START tested paint chips from the walls of the building and screened negative for lead.
- START also collected sampled from ACM suspect materials and confirmed that they were negative for asbestos.
- START finished hazard categorization on all containers in the main warehouse building.
- ERRS cleaned the building floor in areas which were covered in sludge that were pH-10. The sludge was contained in the sumps.
- All totes containing acid have been pumped and stored in the vertical poly tanks.

There are 6 sludge boxes with 25 yd3 capacity per box that were used to hold the waste material evacuated from 8 sumps. Listed below is the approximate amount per box:

1)	Sump 1 &2 – 65% full	~ 18 yd3
2)	Sump 2 – 50% full	~ 13 yd3
3)	Sump 4 & 6 – 50% full	~ 13 yd3
4)	Sump 4 – 50% full	~ 13 yd3
5)	Sump 3, 4 & 5 – 50% full	~ 13 yd3
6)	Sump 7 & 8 – 50% full	~ 13 yd3
	Total Volume	*~ 83 yd3*

There is one frac tank that contains ~ 18,000 gals of waste liquid (pH 10).

There are 6 vertical poly tanks containing acid waste (pH 2) material from totes and the vats. All of the poly tanks are full, storing approximately 30,000 gallons.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

It is anticipated that ERRS will begin to cut up and decontaminate the totes that were pumped out. Most of the totes contain sludge that will need to be removed and added to the appropriate waste stream.

Also during the next reporting period trucks will be arriving to pump out some of the acid from the poly tanks which will allow for more space to pump additional acid from the interior of the building. Finally, some of the liquids and sludges that have accumulated on the floor will be solidified and added to the appropriate waste stream.

2.2.1.2 Next Steps

ERRS has requested bids for the sludge materials and rolloff boxes are going to be obtained to containerize the many drums of waste solids that are in the building.

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
ERRS - Cleanup Contractor	$190,000.00	$100,000.00	$90,000.00	47.37%
START	$35,206.00	$20,000.00	$15,206.00	43.19%
Intramural Costs				
USEPA - Direct	$15,000.00	$1,000.00	$14,000.00	93.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$255,206.00	$121,000.00	$134,206.00	52.59%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 2
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level

RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #5**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 7/5/2011
Reporting Period: 6/20/11 - 7/1/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Former Manufacturing Facility.

1.1.2 Site Description

American Screw and Rivet (ASR) was a manufacturer of screws and rivets operating at the Site until late 2010. The Site was referred to ERRB in June of 2011 for a Removal Site Evaluation and due to the presence of high levels of hazardous materials unsecured and exposed to the environment; an Emergency Response was initiated at the Site on June 3, 2011.

1.1.2.1 Location

The Site is located at 1625 Manse Jolly Rd., Anderson, SC. The area surrounding the Site is a mixture of light industrial, woods, and residences. There is also a small pond that receives the drainage from the facility.

1.1.2.2 Description of Threat

For a description of threat, please refer to previous POLREPs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

For details of the removal assessment, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- 26,000 gallons of pH2 liquids were loaded and shipped off site for disposal. This emptied the ASTs that were holding the pH 2 liquids, they were then decontaminated.
- ERRS decontaminated and completed the destruction of the pH 10 poly totes. The decontamination liquids and sludges were collected in sumps within the building.
- Crews assisted EPA CID, EPA NEIC, DHEC Law Enforcement, and SESD during on site visit and sample collection.
- Potential asbestos material sampled and submitted to AES for analysis (AM = 15; asbestos positive for amosite). These materials are from two crates that are label fire brick. ERRS is working on a plan to remove the materials from the site without disturbing them.
- ERRS decontaminated and completed the destruction of 38 poly totes that contained acid. The residual material in the totes was neutralized using soda ash. The decontamination liquids were collected in sumps withing the building.
- ERRS began cleaning and sorting miscellaneous debris inside the building.
- Various assortment of paint cans and paint related material was found on shelves and START began Hazardous Characterization of the material.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- ERRS will continue to cut up and decontaminate the pH 2 totes.
- ERRS will also begin to overpack and/or prepare drums for transportation and disposal.
- The sludges located in the sludge boxes on site will also be removed from the Site and disposed of.

2.2.1.2 Next Steps

A plan to investigate and/or remove three sludge pits located behind the main warehouse will be developed.

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figuresknown to the OSC at the time this report was written. The costaccounting provided in this report does not necessarily represent anexact monetary figure which the government may include in any claim forcost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$600,000.00	$200,000.00	$400,000.00	66.67%
START	$35,206.00	$20,000.00	$15,206.00	43.19%
Intramural Costs				
USEPA - Direct	$15,000.00	$1,000.00	$14,000.00	93.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$665,206.00	$221,000.00	$444,206.00	66.78%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 2
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency

Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #6**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 7/11/2011
Reporting Period: 7/5/11 - 7/9/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Former Manufacturing Facility.

1.1.2 Site Description

American Screw and Rivet (ASR) was a manufacturer of screws and rivets operating at the Site until late 2010. The Site was referred to ERRB in June of 2011 for a Removal Site Evaluation and due to the presence of high levels of hazardous materials unsecured and exposed to the environment; an Emergency Response was initiated at the Site on June 3, 2011.

1.1.2.1 Location

The Site is located at 1625 Manse Jolly Rd., Anderson, SC. The area surrounding the Site is a mixture of light industrial, woods, and residences. There is also a small pond that receives the drainage from the facility.

1.1.2.2 Description of Threat

For a description of threat, please refer to previous POLREPs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

For details of the removal assessment, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS decontaminated and completed the destruction of 38 corrosive totes. The decontamination liquids were collected in an onsite sump. The remaining material in totes was neutralized using soda ash.
- Three roll offs containing pH 10 solids were shipped off site leaving one remaining roll off.
- Two vacuum tankers collected approximately 10,200 gallons of pH 10 liquids from the frac tank and removed the material from the Site for disposal.
- Three vacuum boxes of pH 10 sludge were removed from Site.
- ERRS continued cleaning and sorting miscellaneous debris inside the building and conducted decontamination of the floors.
- START completed Hazardous Characterization of paint and sealer cans; and containers were segregated by ignitability.
- START conducted Hazardous Characterization of AST #4, which is a container that has been inaccessible until now. The materials in the AST have a pH 10 and contain a mixture of liquid and sludge.
- ERRS began segregation of all drums by waste stream for future disposal.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- ERRS will also begin to overpack and/or prepare drums for transportation and disposal.
- The sludges located in the sludge boxes on site will also be removed from the Site and disposed of.

2.2.1.2 Next Steps

A plan to investigate and/or remove three sludge pits located behind the main warehouse will be developed.

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$560,000.00	$326,000.00	$234,000.00	41.79%
START	$35,206.00	$20,000.00	$15,206.00	43.19%
Intramural Costs				
USEPA - Direct	$15,000.00	$1,000.00	$14,000.00	93.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$625,206.00	$347,000.00	$278,206.00	44.50%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #7**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 7/19/2011
Reporting Period: 7/11/15 - 7/15/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential

uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS decontaminated and completed the destruction of poly drums, poly ASTs and totes. The decontamination liquids were collected in onsite sumps within the building.
- The residual material in the poly drums, poly ASTs and totes was neutralized using soda ash. After adding and mixing the soda ash.
- ERRS removed fiber drums of dry sludge (pH-10) material for disposal. The drums were placed in lined rolloff boxes.
- ERRS cleaned and sorted miscellaneous debris inside the building and cleaned the warehouse floor in high traffic areas for safety.
- The steel cages protecting the totes were cut and staged for disposal or recycling.
- ERRS overpacked any remaining deteriorated drums.
- DHEC personnel on site to observe field activities and coordinated future sampling with EPA.
- The steel frac tank has been pumped and will be decontaminated and removed from site.
- The remaining vacuum boxes were removed from the site and the contents removed for disposal.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- ERRS will also begin to overpack and/or prepare drums for transportation and disposal.
- ERRS will continue to clean areas inside the building.
- A liquidator for the bankruptcy case at the Site will also visit the Site to determine the items that may or may not have value to the bankruptcy. He will also provide storage space for those items that are of value.

2.2.1.2 Next Steps

A plan to investigate and/or remove three sludge pits located behind the main warehouse will be developed.

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$560,000.00	$350,000.00	$210,000.00	37.50%
START	$60,000.00	$40,000.00	$20,000.00	33.33%
Intramural Costs				
USEPA - Direct	$15,000.00	$3,000.00	$12,000.00	80.00%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$650,000.00	$393,000.00	$257,000.00	39.54%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #8**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 8/1/2011
Reporting Period: 7/18/11 - 7/29/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential

uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS continued the destruction of poly drums, poly ASTs, vats and totes. The decontamination liquids were collected in onsite sumps within the building. The residual materials from these containers was neutralized using soda ash.
- ERRS continued to overpack any remaining deteriorated drums.
- START and ERRS worked to drill holes in the concrete floor in order to check the type of foundation and to collect soil samples underneath.
- The sludge that surrounded the acid totes was neutralized using soda ash and then placed into containers for disposal.
- DHEC personnel on site to observe field activities and coordinated future sampling with EPA.
- The steel frac tank has been decontaminated and removed from site. At this point all ASTs, frac tanks, and vacuum boxes have been removed from the Site.
- Incident: On July 29 while mixing some pH 7 and pH 10 liquids together for bulking, a reaction occurred producing a brownish-orange vapor cloud inside the building. Knowing the materials that were mixed, it was assumed to be a Nitrogen dioxide (NO2) plume. The crew was evacuated to the muster point and the AreaRaes onsite were calibrated to check for NO and NO2. A sensor was placed at the two main entry points to the building and at the fence before Manse Jolly Road. Then, fans were placed in the building to help ventilation and air sparging was conducted on the materials to accelerate the reaction. ERRS monitored the AreaRaes throughout the night and the readings fell below detection limits by morning.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- ERRS will continue to decontaminate any remaining containers in the building.
- ERRS will also begin the process of building demolition including the removal of three sludge pits located behind the building.
- START will collect further samples including confirmation samples at the Site.

2.2.1.2 Next Steps

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$860,000.00	$500,000.00	$360,000.00	41.86%
START	$100,000.00	$60,000.00	$40,000.00	40.00%
Intramural Costs				
USEPA - Direct	$15,000.00	$3,000.00	$12,000.00	80.00%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$990,000.00	$563,000.00	$427,000.00	43.13%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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10838102

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #9**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 8/26/2011
Reporting Period: 8/1/11 - 8/26/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

START along with ERRS continue to conduct activities to identify threats and contain potential

uncontrolled releases.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS continued the destruction of poly drums, poly ASTs, vats and totes. The decontamination liquids were collected in onsite sumps within the building. The residual materials from these containers was neutralized using soda ash. At this point all recoverable sludge and liquids have been removed from pits inside the building.
- Work on drums inside the building has been completed and all drums were moved to a bermed area outside the building awaiting disposal.
- The asbestos fire bricks that were stored in the building were removed from the Site by a permitted asbestos remediation contractor.
- ERRS also conducted all activities inside the building in preparation for building demolition. These activities included torching steel beams, removing equipment, and clearing out the former offices. All potential scrap metal was staged outside the building.
- ERRS also began demolition of the building itself.
- DHEC personnel on site to observe field activities and coordinated future sampling with EPA.

Also during this reporting period the OSC participated in a DHEC public meeting on August 22, 2011 to discuss past, present, and future site activities.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- Load out and disposal of the building materials.
- Removal of the three former water treatment pits located behind the main building.
- Load out and disposal of the scrap metal collected during demolition activities.
- An investigation will also be made in an area of the site that appears to have an underground storage tank.

2.2.1.2 Next Steps

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,000,000.00	$650,000.00	$350,000.00	35.00%
IAGs	$5,000.00	$0.00	$5,000.00	100.00%
START	$105,000.00	$83,000.00	$22,000.00	20.95%
Intramural Costs				
USEPA - Direct	$15,000.00	$5,000.00	$10,000.00	66.67%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$1,140,000.00	$738,000.00	$402,000.00	35.26%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 6

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
UST - Underground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #10**
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Jeffery J. Crowley, On Scene Coordinator
Date: 9/16/2011
Reporting Period: 8/29/11 - 9/16/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

All threats posed by hazardous materials located in drums, vats and other containers have been

removed from the building. The Site is now in the demolition and site restoration phase.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS continued building demolition activities during this reporting period. To date, the walls and foundation have been demolished and a large portion of the materials have been transported off the Site for disposal. Some of the non-hazardous concrete has been sent to a paving company to be ground and used in road construction activities.
- ERRS also removed and orphan containers that were located in on-site ditches and ravines. These containers were hazard categorized and added to the current waste streams if applicable.
- START with the assistance of ERRS sampled the sediment and surface water in the pond located behind the Site as well as the outfall of the pond downstream. Sample results are expected during the next reporting period.
- DHEC personnel on site to observe field activities and coordinated future sampling with EPA.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- Continued load out and disposal of the building materials.
- Removal of the three former water treatment pits located behind the main building.
- Continued load out and disposal of the scrap metal collected during demolition activities.
- An investigation will also be made in an area of the site that appears to have an underground storage tank.
- Ship off any drums remaining from that phase of the project.
- Analyze data gathered from the pond sampling and determine if any action is needed.
- Site restoration activities including grading, grassing and erosion control measures.

2.2.1.2 Next Steps

2.2.2 Issues

None at this time.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,040,000.00	$837,000.00	$203,000.00	19.52%
IAGs	$5,000.00	$0.00	$5,000.00	100.00%
START	$150,000.00	$95,000.00	$55,000.00	36.67%
Intramural Costs				
USEPA - Direct	$15,000.00	$10,000.00	$5,000.00	33.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$1,225,000.00	$942,000.00	$283,000.00	23.10%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 5

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
UST - Underground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/reports

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

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10839256

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #11**
Continuation of Removal Action
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Benjamin Franco, On Scene Coordinator
Date: 10/5/2011
Reporting Period: 9/17/2001 - 9/30/2011

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

All threats posed by hazardous materials located in drums, vats and other containers have been removed from the building. The Site is now in the demolition and site restoration phase.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- ERRS also removed and orphan containers that were located in on-site ditches and ravines. These containers were hazard categorized and added to the current waste streams if applicable.
- START with the assistance of ERRS sampled the sediment and surface water in the pond located behind the Site as well as the outfall of the pond downstream. Sample results are expected during the next reporting period.
- DHEC personnel on site to observe field activities and coordinated future sampling with EPA.
- Continued load out and disposal of the building materials.
- Removal of the three former water treatment pits located behind the main building.
- Continued load out and disposal of the scrap metal collected during demolition activities.

- An investigation was made in an area of the site that appears to have an underground storage tank. ERRS test trenched the suspected area and did not found any underground structures.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- Final off-site disposal of overpacked drums and totes containing bulked material.
- Analyze data gathered from the pond sampling and determine if any action is needed.
- Complete site restoration activities including grading, grassing and erosion control measures.

2.2.1.2 Next Steps

2.2.2 Issues

None at this time.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,040,000.00	$837,000.00	$203,000.00	19.52%
IAGs	$5,000.00	$0.00	$5,000.00	100.00%
START	$150,000.00	$95,000.00	$55,000.00	36.67%
Intramural Costs				
USEPA - Direct	$15,000.00	$10,000.00	$5,000.00	33.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$1,225,000.00	$942,000.00	$283,000.00	23.10%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 5

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
UST - Underground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/report

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #12**
Continuation of Removal Action
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Jim Mcguire, ERRB

From: Benjamin Franco, On Scene Coordinator
Date: 10/25/2011
Reporting Period: 10/01/11-10/21/11

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

All threats posed by hazardous materials located in drums, vats and other containers have been removed from the building. The Site is now in the demolition and site restoration phase.

2.1.2 Response Actions to Date

The following actions were completed during this reporting period:

- Hazardous and non-hazardous bulked liquid waste,overpacked drums and solid waste were shipped offsite for disposal.
- ERRS reggraded the site, added topsoil to the bare soil, and reseeded it with fescue and rye grass.
- EPA and ERRS and START contractors have demobilized from the Site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- Analyze data gathered from the pond sampling and determine if any further action is needed.

2.2.1.2 Next Steps

- Analyze data gathered from the pond sampling and determine if any further action is needed.

2.2.2 Issues

None at this time.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,040,000.00	$837,000.00	$203,000.00	19.52%
IAGs	$5,000.00	$0.00	$5,000.00	100.00%
START	$150,000.00	$95,000.00	$55,000.00	36.67%
Intramural Costs				
USEPA - Direct	$15,000.00	$10,000.00	$5,000.00	33.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$1,225,000.00	$942,000.00	$283,000.00	23.10%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 1
START (Otie) - 1
ERRS (ER) - 5

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
UST - Underground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/report

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Screw and Rivet - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #13**
Final
American Screw and Rivet
B4J8
Anderson, SC
Latitude: 34.5913130 Longitude: -82.6792440

To: Matt Taylor, ERRB

From: Benjamin Franco, On Scene Coordinator
Date: 4/17/2012
Reporting Period:

1. Introduction

1.1 Background

Site Number:	B4J8	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/13/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2011	**Start Date:**	6/3/2011
Demob Date:	10/25/2011	**Completion Date:**	10/25/2011
CERCLIS ID:	SCR0000006635	**RCRIS ID:**	
ERNS No.:		**State Notification:**	06/02/2011
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

All threats posed by hazardous materials located in drums, vats and other containers have been removed from the building. The building was demolished and EPA conducted an assessment of the soil under the building, surrounding areas and a pond located on the property. Surface water and sediment sampling of the pond had results below EPA Region 4's Removal Action Level and no further action will

be done concerning the pond. EPA has completed all response actions pertaining to the Site.

2.1.2 Response Actions to Date

On October 18, 2011, all equipment and EPA resources have demobilized from the Site

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Coordination with EPA's attorneys on this matter continues. EPA has been in contact with the trustees and owners and has secured access from both.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Treatment	Disposal
Sludge from inside building pits	Organic Sludges	148 tons	Solidify	Treatment Vopak Logistic Services Recovery Services - Piedmont 305 South Main Street Mauldin, SC 29662 Landfill Upstate Regional MSW Subtitle D Landfill 868 Wildcat Road Enoree, SC 29335
Acid/Heavy Metal Hazardous Liquids	Bulked Hazardous Waste Liquids	24,535 gallons	Neutralized	Vickery Environmental 3956 State Route 412 Vickery, OH 43464
Non-Hazardous Bulked waste water	Non-Hazardous Wastewater	15,010		Vopak Logistic Services Recovery Systems - Piedmont 305 South Main Street Mauldin, SC 29662
Waste Corrosive Hazardous Liquids	Drums	6,350 lbs		EQ Detroit 1923 Frederick St Detroit, MI
				EQ Detroit

Caustic Hazardous Liquid	Drums	4,800 lbs		1923 Frederick St Detroit, MI
Chromic acid Solution Hazardous Liquid	Drums	5,800 lbs		EQ Detroit 1923 Frederick St Detroit, MI
Flammable Hazardous Liquids	Drums	2,700lbs		EQ Detroit 1923 Frederick St Detroit, MI
Liquids, Non-Hazardous	Drums	7,600lbs		EQ Detroit 1923 Frederick St Detroit, MI
Solids, Non-Hazardous	Drums	2,120 lbs		EQ Detroit 1923 Frederick St Detroit, MI
PCB Waste	Ballast	100lbs		Wayne Disposal 49350 N I-94 Service Dr Belleville, MI 48111
Mercury , Universal waste	Lab Equipment, Switches	25 lbs		EQ Detroit 1923 Frederick St Detroit, MI
Non-Hazardous soil and debris	Soil	773 tons		Upstate Regional MSW Subtitle D Landfill 868 Wildcat Road Enoree, SC 29335
Non-Hazardous Building Debris	Debris	731 tons		Upstate Regional MSW Subtitle D Landfill 868 Wildcat Road Enoree, SC 29335
Asbsestos Material	Oven Insulation and bagged Material	10 tons		Upstate Regional MSW Subtitle D Landfill 868 Wildcat Road Enoree, SC 29335
				Belton Metals

Recycled Steel		**229,150 lbs**		**375 Sherrard Road Belton, SC 29627**
Recycled Zinc		**729 lbs**		**Belton Metals 375 Sherrard Road Belton, SC 29627**
Recycled Copper		**1,800 lbs**		**Belton Metals 375 Sherrard Road Belton, SC 29627**

2.2 Planning Section

2.2.1 Anticipated Activities
None

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps
None

2.2.2 Issues

None at this time.

2.3 Logistics Section
No information available at this time.

2.4 Finance Section
2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,040,000.00	$905,962.00	$134,038.00	12.89%
IAGs	$5,000.00	$0.00	$5,000.00	100.00%
START	$150,000.00	$95,000.00	$55,000.00	36.67%
Intramural Costs				

USEPA - Direct	$15,000.00	$10,000.00	$5,000.00	33.33%
USEPA - InDirect	$15,000.00	$0.00	$15,000.00	100.00%
Total Site Costs	$1,225,000.00	$1,010,962.00	$214,038.00	17.47%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA is the primary Safety Officer.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

South Carolina Department of Health and Environmental Conservation

4. Personnel On Site

The following represent the maximum staffing during this reporting period:

EPA OSC - 0
START (Otie) - 0
ERRS (ER) - 0

5. Definition of Terms

ASR - American Screw and Rivet
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote

SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
UST - Underground Storage Tank

6. Additional sources of information

6.1 Internet location of additional information/report

SCDHEC American Screw and Rivet Corporation referral package to EPA Region 4 Emergency Response and Removal Branch attached in the documents section.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.

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ASR - AW
Waste lab results

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Lab Order: 1106D92
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-001

Client Sample ID: ASR-AW-PH10
Collection Date: 6/15/2011 11:25:00 AM
Matrix: WASTE

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010								Analyst: **AZS**
Ignitability	180	>	0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A				(SW7470A)				Analyst: **MP**
Mercury	BRL		0.00516	0.0200	mg/L	147805	1	6/17/2011 2:51:58 PM
ICP METALS, TCLP SW1311/6010C				(SW3010A)				Analyst: **MAW**
Arsenic	0.0528	J	0.0315	0.250	mg/L	147856	1	6/17/2011 5:29:37 PM
Barium	0.0970	J	0.00450	0.500	mg/L	147856	1	6/17/2011 5:29:37 PM
Cadmium	BRL		0.000500	0.0250	mg/L	147856	1	6/17/2011 5:29:37 PM
Chromium	0.273		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:29:37 PM
Lead	BRL		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:29:37 PM
Selenium	0.0847	J	0.0205	0.100	mg/L	147856	1	6/17/2011 5:29:37 PM
Silver	BRL		0.00150	0.0250	mg/L	147856	1	6/17/2011 5:29:37 PM
LABORATORY HYDROGEN ION (PH) SW9045D				(SW9045D)				Analyst: **SRI**
pH	9.65	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

11089689

Qualifiers:	*	Value exceeds Maximum Contaminant Level	<	Less than Result value
	>	Greater than Result value	B	Analyte detected in the associated Method Blank
	E	Estimated value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified
	Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix
			BRL	Not detected at MDL

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Lab Order: 1106D92
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-002

Client Sample ID: ASR-AW-PD25
Collection Date: 6/15/2011 11:04:00 AM
Matrix: WASTE

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010								Analyst: **AZS**
Ignitability	150		0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A					**(SW7470A)**			Analyst: **MP**
Mercury	BRL		0.0103	0.0400	mg/L	147805	1	6/17/2011 2:53:54 PM
ICP METALS, TCLP SW1311/6010C					**(SW3010A)**			Analyst: **MAW**
Arsenic	BRL		0.315	2.50	mg/L	147856	1	6/17/2011 5:36:29 PM
Barium	0.509	J	0.0450	5.00	mg/L	147856	1	6/17/2011 5:36:29 PM
Cadmium	0.0449	J	0.00500	0.250	mg/L	147856	1	6/17/2011 5:36:29 PM
Chromium	0.112	J	0.0300	0.500	mg/L	147856	1	6/17/2011 5:36:29 PM
Lead	BRL		0.0300	0.500	mg/L	147856	1	6/17/2011 5:36:29 PM
Selenium	0.233	J	0.205	1.00	mg/L	147856	1	6/17/2011 5:36:29 PM
Silver	BRL		0.0150	0.250	mg/L	147856	1	6/17/2011 5:36:29 PM
LABORATORY HYDROGEN ION (PH) SW9045D					**(SW9045D)**			Analyst: **SRI**
pH	3.64	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level
>	Greater than Result value
E	Estimated value above quantitation range
J	Estimated value detected below Reporting Limit
Rpt Lim	Reporting Limit
<	Less than Result value
B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
N	Analyte not NELAC certified
S	Spike Recovery outside limits due to matrix
BRL	Not detected at MDL

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Lab Order: 1106D92
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-003

Client Sample ID: ASR-AW-PD7
Collection Date: 6/15/2011 11:15:00 AM
Matrix: WASTE

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010							Analyst: **AZS**	
Ignitability	180	>	0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A				(SW7470A)			Analyst: **MP**	
Mercury	BRL		0.00103	0.00400	mg/L	147805	1	6/17/2011 2:55:50 PM
ICP METALS, TCLP SW1311/6010C				(SW3010A)			Analyst: **MAW**	
Arsenic	0.316		0.0315	0.250	mg/L	147856	1	6/17/2011 5:40:00 PM
Barium	0.0770	J	0.00450	0.500	mg/L	147856	1	6/17/2011 5:40:00 PM
Cadmium	BRL		0.000500	0.0250	mg/L	147856	1	6/17/2011 5:40:00 PM
Chromium	1.34		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:40:00 PM
Lead	0.535		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:40:00 PM
Selenium	BRL		0.0205	0.100	mg/L	147856	1	6/17/2011 5:40:00 PM
Silver	BRL		0.00150	0.0250	mg/L	147856	1	6/17/2011 5:40:00 PM
LABORATORY HYDROGEN ION (PH) SW9045D				(SW9045D)			Analyst: **SRI**	
pH	BRL	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level
>	Greater than Result value
E	Estimated value above quantitation range
J	Estimated value detected below Reporting Limit
Rpt Lim	Reporting Limit
<	Less than Result value
B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
N	Analyte not NELAC certified
S	Spike Recovery outside limits due to matrix
BRL	Not detected at MDL

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Client Sample ID: ASR-AW-SOIL#1
Lab Order: 1106D92
Collection Date: 6/15/2011 11:02:00 AM
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-004
Matrix: SOIL

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010								Analyst: **AZS**
Ignitability	180	>	0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A					(SW7470A)			Analyst: **MP**
Mercury	BRL		0.00103	0.00400	mg/L	147805	1	6/17/2011 2:57:46 PM
ICP METALS, TCLP SW1311/6010C					(SW3010A)			Analyst: **MAW**
Arsenic	BRL		0.0315	0.250	mg/L	147856	1	6/17/2011 5:43:49 PM
Barium	1.47		0.00450	0.500	mg/L	147856	1	6/17/2011 5:43:49 PM
Cadmium	0.0200	J	0.000500	0.0250	mg/L	147856	1	6/17/2011 5:43:49 PM
Chromium	0.0534		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:43:49 PM
Lead	0.0102	J	0.00300	0.0500	mg/L	147856	1	6/17/2011 5:43:49 PM
Selenium	BRL		0.0205	0.100	mg/L	147856	1	6/17/2011 5:43:49 PM
Silver	BRL		0.00150	0.0250	mg/L	147856	1	6/17/2011 5:43:49 PM
LABORATORY HYDROGEN ION (PH) SW9045D					(SW9045D)			Analyst: **SRI**
pH	8.92	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	<	Less than Result value
>	Greater than Result value	B	Analyte detected in the associated Method Blank
E	Estimated value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified
Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix
		BRL	Not detected at MDL

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Lab Order: 1106D92
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-005

Client Sample ID: ASR-AW-SD1
Collection Date: 6/15/2011 11:31:00 AM
Matrix: WASTE

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010								Analyst: **AZS**
Ignitability	148		0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A					(SW7470A)			Analyst: **MP**
Mercury	BRL		0.0103	0.0400	mg/L	147805	1	6/17/2011 2:59:43 PM
ICP METALS, TCLP SW1311/6010C					(SW3010A)			Analyst: **MAW**
Arsenic	BRL		0.315	2.50	mg/L	147856	1	6/17/2011 5:47:46 PM
Barium	3.80	J	0.0450	5.00	mg/L	147856	1	6/17/2011 5:47:46 PM
Cadmium	0.0364	J	0.00500	0.250	mg/L	147856	1	6/17/2011 5:47:46 PM
Chromium	0.289	J	0.0300	0.500	mg/L	147856	1	6/17/2011 5:47:46 PM
Lead	0.137	J	0.0300	0.500	mg/L	147856	1	6/17/2011 5:47:46 PM
Selenium	BRL		0.205	1.00	mg/L	147856	1	6/17/2011 5:47:46 PM
Silver	BRL		0.0150	0.250	mg/L	147856	1	6/17/2011 5:47:46 PM
LABORATORY HYDROGEN ION (PH) SW9045D					(SW9045D)			Analyst: **SRI**
pH	9.43	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level
>	Greater than Result value
E	Estimated value above quantitation range
J	Estimated value detected below Reporting Limit
Rpt Lim	Reporting Limit
<	Less than Result value
B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
N	Analyte not NELAC certified
S	Spike Recovery outside limits due to matrix
BRL	Not detected at MDL

Analytical Environmental Services, Inc.

Date: *17-Jun-11*

CLIENT: Oneida Total Integrated Enterprises
Lab Order: 1106D92
Project: American Screws + Rivets Corp/One American
Lab ID: 1106D92-006

Client Sample ID: ASR-AW-PD8
Collection Date: 6/15/2011 11:09:00 AM
Matrix: WASTE

Analyses	Result	Qual	MDL	Rpt. Limit	Units	BatchID	DF	Date Analyzed
IGNITABILITY SW1010							Analyst: **AZS**	
Ignitability	116		0	0	°F		1	6/17/2011 7:50:00 AM
MERCURY, TCLP SW1311/7470A				(SW7470A)			Analyst: **MP**	
Mercury	0.00295	J	0.00103	0.00400	mg/L	147805	1	6/17/2011 3:05:35 PM
ICP METALS, TCLP SW1311/6010C				(SW3010A)			Analyst: **MAW**	
Arsenic	0.911		0.0315	0.250	mg/L	147856	1	6/17/2011 5:51:32 PM
Barium	0.796		0.00450	0.500	mg/L	147856	1	6/17/2011 5:51:32 PM
Cadmium	BRL		0.000500	0.0250	mg/L	147856	1	6/17/2011 5:51:32 PM
Chromium	714	*	0.0300	0.500	mg/L	147856	10	6/17/2011 6:24:26 PM
Lead	0.994		0.00300	0.0500	mg/L	147856	1	6/17/2011 5:51:32 PM
Selenium	BRL		0.0205	0.100	mg/L	147856	1	6/17/2011 5:51:32 PM
Silver	0.00493	J	0.00150	0.0250	mg/L	147856	1	6/17/2011 5:51:32 PM
LABORATORY HYDROGEN ION (PH) SW9045D				(SW9045D)			Analyst: **SRI**	
pH	BRL	H	0.01	0.01	pH Units	147912	1	6/17/2011 3:00:00 PM

Positive for Chlorides

Qualifiers:

*	Value exceeds Maximum Contaminant Level
>	Greater than Result value
E	Estimated value above quantitation range
J	Estimated value detected below Reporting Limit
Rpt Lim	Reporting Limit
<	Less than Result value
B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
N	Analyte not NELAC certified
S	Spike Recovery outside limits due to matrix
BRL	Not detected at MDL

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 14 2011

Mr. Ken Taylor
SC Dept. of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

Dear Mr. Taylor:

We are pleased to provide a copy of the Ceiling Increase Action Memorandum for the American Screw and Rivet Site located in Anderson, Anderson County, South Carolina. If you have any questions or comments concerning this document or the continuation of the removal activities at this Site, please contact the On-Scene Coordinator at the following address:

Jeffery Crowley
U.S. Environmental Protection Agency
ERRB
61 Forsyth Street
Atlanta, Georgia 30303

Sincerely,

A. Shane Hitchcock, Chief
Emergency Response & Removal Branch

Enclosure

cc: Debbie Jourdan
Jim McGuire
Dawn Taylor
Kerri Sanders
Jeffery Crowley
Timothy Neal

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 13 2011

ACTION MEMORANDUM

SUBJECT: Request for a Ceiling Increase at the American Screw and Rivet Site, Anderson, Anderson County, South Carolina

FROM: Jeffery J. Crowley, On-Scene Coordinator
Emergency Response and Removal Branch

THRU: Shane Hitchcock, Chief
Emergency Response and Removal Branch

TO: Franklin E. Hill, Director
Superfund Division

Site ID #: B4J8

I. PURPOSE

The purpose of this Action Memorandum is to request and document a ceiling increase and change in the scope of response for the American Screw and Rivet Site (the Site) located in Anderson, Anderson County, South Carolina. The Site continues to pose a threat to public health and the environment that meets the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) section 300.415(b)(2) criteria for removal actions. Site activities were commenced as stated in the Emergency Action Memorandum signed June 4, 2011. A ceiling increase is needed in order to continue stabilization activities at the Site and to further mitigate the threats to human health, welfare, and the environment. If approved, this ceiling increase will bring the total project ceiling to $1,394,000, of which $1,294,000 will be funded through the Region Removal Allowance.

II. SITE CONDITIONS AND BACKGROUND INFORMATION

CERCLIS ID #: SCR0000006635

A. Site Description

For Site Description including removal site evaluation, physical location, and site characteristics, please refer to the Emergency Action Memorandum dated June 4, 2011 (attached).

B. Other Actions to Date

An emergency removal action was approved in the June 4, 2011 Action Memorandum. This action was initiated under the OSC's warranted $200,000 authority. Response actions began on June 3, 2011. The emergency response was necessary to mitigate the threats posed from the abandonment of an electroplating facility that was not secure and had high levels of hazardous materials stored in drums, vats, sumps, and other small containers. The materials were located within 30 feet of a public road, and the facility had many access points. Rain infiltrates the building, causing many contaminants to spill inside the facility. Further background information about the initial response can be found in the June 4 Action Memorandum and in the subsequent Pollution Reports (POLREP). The following activities have been conducted at the Site to date:

- The totes in the building were hazard categorized (hazcatted) and separated into to waste streams, pH 2 and those with pH 9 to 10. The fluids from the pH 2 totes were consolidated into poly frac tanks and those between 9 and 10 were consolidated into metal frac tanks.
- Drums, vats, and sumps in the building were hazcatted.
- All free liquids located in open top drums, vats, and on the building floor were hazcatted and segregated according to pH.
- Materials on the floor of the building were removed.
- Superfund Technical Assessment and Response Team (START) then sampled the waste streams and took additional samples of other containers, sludges, and a few surface soil locations.

The ceiling increase is needed to continue these activities and conduct further sampling and removal of impacted soils and other areas of the Site.

C. State and Local Authorities' Roles

1. State and local actions to date

South Carolina Department of Health and Environmental Control (DHEC) visited the Site on May 27, 2011 and referred it to ERRB. DHEC continues to monitor the Site and wish to be updated on Site activities.

2. Potential for continued State/local response

DHEC will be updated on Site activities by EPA.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR TO THE ENVIRONMENT, AND STATUTORY AND REGULAROTY AUTHORITIES

The threats posed by this Site are detailed in the attached original Action Memorandum. These significant threats continue to exist and will worsen if response actions are delayed.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The additional funds will be used to complete the proposed actions listed in the June 4, 2011 Action Memorandum.

2. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. Applicable or relevant appropriate requirements (ARARs)

Due to this phase of the cleanup being conducted as an emergency action, ARARs have not been conclusively determined. DHEC and EPA will work to obtain ARARs for the Site should the Site continue as a time-critical removal once the emergency phase is completed.

4. Project Schedule

Additional response actions at the Site will be initiated upon approval of this Action Memorandum. Foregoing any unexpected delays, all actions are expected to be complete within six months of remobilization.

B. Estimated Costs

	Current Ceiling	Proposed Increase	Proposed Ceiling
Extramural Costs:			
Regional Allowance Costs:			
ERRS	180,000	920,000	1,100,000
Non-Regional Allowance Costs:			
START	20,000	40,000	60,000
IAG	0	10,000	10,000
Subtotal, Extramural Costs:	200,000	970,000	1,170,000
20% Contingency:		194,000	
TOTAL EXTRAMURAL COSTS:	**200,000**	**1,164,000**	**1,364,000**
Intramural Costs:			
Direct Costs		30,000	
TOTAL SITE CEILING:	**$200,000**	**$1,194,000**	**$1,394,000**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD THE ACTION BE DELAYED OR NOT TAKEN

Actual or threatened releases of hazardous substances from this site, if not addressed by the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

VII. OUTSTANDING POLICY ISSUES

No outstanding policy issues have been determined at this time.

VIII. ENFORCEMENT

Enforcement activities have been initiated and are ongoing. The Site is currently in bankruptcy and it is expected that the cleanup will be conducted fund-lead.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $2,024,924 using the following formula: (Total Extramural Costs + Total Intramural Costs) + (45.26% x (Total Extramural Costs + Total Intramural Costs)) or ($1,364,000+$30,000) + (45.26% x ($1,364,000+$30,000)) = $2,024,924[1].

IX. RECOMMENDATION

This decision document represents the selected removal action for the American Screw and Rivet Site located in Anderson, Anderson County, South Carolina, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal action, and I recommend your approval of the proposed project ceiling increase to allow a continued removal response. If approved, this ceiling increase will bring the total project ceiling to $1,394,000, of which $1,294,000 will be funded through the Region Removal Allowance.

APPROVED: _____ DATE: 6/13/11

Franklin E. Hill, Director
Superfund Division

DISAPPROVED: _____ DATE: _____

Franklin E. Hill, Director
Superfund Division

[1] Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific directs costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

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GN Letter for Manse Jolley American Screw & Rivet Corporation
Teresa Mann
to:
Jeffery Crowley, Lawrence Bradford, Fernando Rivera
06/10/2011 02:29 PM
Cc:
Tony Moore, Jim McGuire, Annette Fields
Hide Details
From: Teresa Mann/R4/USEPA/US

To: Jeffery Crowley/R4/USEPA/US@EPA, Lawrence Bradford/R4/USEPA/US@EPA, Fernando Rivera/R4/USEPA/US@EPA

Cc: Tony Moore/R4/USEPA/US@EPA, Jim McGuire/R4/USEPA/US@EPA, Annette Fields/R4/USEPA/US@EPA

1 Attachment

American Screw & Rivet general notice letters to property owners 6 10 11.docx

Hi Jeff and Fernando,
To get a jump start on the site, I have attached a draft of the proposed GN for the Manse Jolley Property. Please send your comments to Lawrence and me. Lawrence will handle the GN letters starting on Monday.

Have a nice weekend.
Teresa

Teresa Harris Mann
Office of Environmental Accountability
United States EPA, Region 4
Sam Nunn Atlanta Federal Center, 13th Floor
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9572
(404) 562-9486 (fax)

URGENT LEGAL MATTER – PROMPT REPLY NECESSARY
SENT VIA UNITED STATES POSTAL SERVICE: NEXT DAY DELIVERY

~~Elizabeth~~ Ann Stein Cartlidge
Mary Susan Stein
Nancy Marie Stein
John Richard Stein
Robert William Stein
William L. Stein

Re: General Notice Letter and Invitation to Conduct a Removal Action at the American Screw & Rivet Company, 1625 Manse Jolley Road, Anderson County, Anderson, South Carolina

(We can send one letter to all or individual letters) Dear Ladies and Gentlemen:

The purposes of this letter are to: (1) notify you of your potential liability, pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9607 (commonly known as the federal Superfund law), that you may have incurred with respect to the American Screw & Rivet Superfund Site (Site) located at 1625 Manse Jolley Road, Anderson, South Carolina; and (2) to offer you the opportunity to conduct or finance the removal action at the Site described herein.

The United States Environmental Protection Agency (EPA) has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the Site. EPA has spent, and is considering spending, additional public funds on actions to investigate and control such releases or threatened releases at the Site. Unless EPA reaches an agreement under which a potentially responsible party (PRP) or parties will properly perform or finance such actions, EPA may perform these actions pursuant to Section 104 of CERCLA.

Background

On November 2010, the South Carolina Department of Health and Environmental Control (SCDHEC) received information that American Screw & Rivet Corporation had stopped operations at 1625 Manse Jolley Road and 1 American Way Road in Anderson, South Carolina, and declared bankruptcy. As stated above, the subject of this letter is the property located at 1625 Manse Jolley Road, Anderson, South Carolina, which is referred to as the Site. On May 27, 2011 SCDHEC conducted an inspection of the facility located at 1625 Manse Jolley Road, and

documented leaking holding tanks and overflowing sumps. SCDHEC also documented the presence of approximately 80 poly totes some of which were labeled hazardous waste, drums, and other containers such as pails, small plastic drums and cardboard containers.

On June 02, 2011, SCDHEC referred the Site to EPA to conduct an assessment. On June 03, 2011, EPA and its contractors began assessing the Site. The initial assessment outside the buildings revealed 44 poly totes that were exposed to the elements, some of which exhibited cage corrosion and an advanced state of degradation. Approximately 23 drums containing wastes were exposed to the elements without containment. The materials are believed to be a mixture of wastes resulting from the facilities production operations. Inside the building, EPA observed overflowing sludge filled sumps, water ponds in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation some of which had spilled their contents, drums and multiple other containers. The building is in poor condition, with holes in the roof that allows for rain water to enter the building.

EPA initiated an emergency response action at the Site. EPA is presently identifying threats and containing releases. Flammable and corrosive liquids have been identified. Evidence of uncontrolled migration into the environment is present. EPA has deployed frac tanks and vacuum trucks to bulk liquids. EPA has also completed a partial removal of spilled materials from the building's floor. EPA's emergency removal action will transition into a time-critical removal action, and EPA will continue to conduct hazardous categorization and segregation of waste streams, and develop soil sampling plans.

Explanation of Potential Liability

PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at a site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered. Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a), and 9607(a), PRPs may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be liable for costs incurred by EPA in cleaning up the site, unless they can show any of the statutory defenses. Such costs may include, but are not limited to, expenditures for investigation, planning, response, and enforcement activities. In addition, PRPs may be required to pay for damages for injury to natural resources, or for their destruction or loss, together with the cost of assessing such damages. Where site conditions present an imminent and substantial endangerment to human health, welfare, or the environment, EPA may also issue an administrative order under CERCLA to require PRPs to commence cleanup activities.

Based on the information collected, including documentation showing the release and/or disposal of hazardous substances at the Site, EPA believes that you may be a PRP and potentially liable under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a) as the current owner of the real property and the owner of the real property at the time of the disposal for the costs of cleaning up the Site, including all costs incurred by EPA in responding to releases at the Site.

Removal Action Required

EPA has determined that the removal action shall include the following:

a. Contain and remove free liquids, sludges and contaminated soils in areas which pose a threat of release to the environment and/or pose a threat of exposure to human and environmental receptors;

b. Pump, overpack, stabilize, or otherwise secure containers found on-site to prevent further release of materials;

c. Excavate contaminated soil from on-site and along run off pathway;

d. Provide temporary onsite storage of wastewaters, sludges, contaminated soils, containers and wastes generated during removal and decontamination activities, pending further waste characterization and profiling for disposal/treatment/reuse/recycling;

e. Collect samples of wastes generated during removal activities, may include hazard categorization or procurement of laboratory analytical services to facilitate disposal/treatment/reuse/recycling; and,

f. Arrange for off-site transportation disposal/treatment /recycling/reuse of hazardous substances.

Scrap Metal

EPA anticipates that there may be certain scrap metal from the Site that could be sold to a metal recycler, and those funds could be credited against the expenses that EPA has or may incur with respect to the cleanup. If it comes to pass that you or American Screw & Rivet Corporation owns the scrap metal free and clear of any encumbrances, including liens, and it no longer the subject to the jurisdiction of any bankruptcy court, EPA would request that you and/or American Screw & Rivet Corporation agree to allow EPA to remove scrap metal from the Site and credit any proceeds received from the sale of the scrap metal against the costs incurred by EPA during the cleanup of the Site. EPA will discuss this matter with you further as the removal is being performed.

PRP Response / Invitation to Conduct Removal Action / Ability to Pay

You are encouraged to contact EPA if you are interested in participating in negotiations to perform and/or finance the above described removal action at the Site. If you choose to enter into negotiations with EPA regarding your performance of the above described removal action, please respond in writing by providing a statement of your willingness and financial ability to conduct the removal action and reimburse EPA for costs already expended, and costs that EPA will incur in overseeing the performance of the removal action. The response is due **within**

seven (7) calendar days of your receipt of this letter. EPA will then send you a draft Settlement Agreement in order to initiate a period of formal negotiations.

If a response to participate in negotiations is not received by EPA **within seven (7) calendar days**, EPA will assume that you have decided not to conduct the removal action and reimburse the Superfund for the Site expenditures. Please be aware however, that you will remain potentially liable for EPA's costs incurred in undertaking activities pursuant to CERCLA and the National Contingency Plan (NCP) at this Site. EPA may then take appropriate action at the Site, which may include: (1) conducting the removal action and pursuing a cost recovery claim under Section 107 of CERCLA against you or (2) issuing a Unilateral Administrative Order (UAO) to you under Section 106(a) of CERCLA, 42 U.S.C. § 9606, requiring you to perform the work. Note that if the recipients of a UAO refuse to comply, EPA may pursue civil litigation against the recipients to require compliance.

Responses to this notice letter may be sent by regular or electronic mail and should be sent to:

Lawrence Bradford
Assistant Regional Counsel
U.S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, Georgia 30303
bradford.lawrence@epa.gov

Please note that, because EPA has a potential claim against you, you must include EPA as a creditor if it files for bankruptcy. EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Information to Assist You

EPA would like to encourage communication between you, other PRPs, and EPA at the Site. To assist you in their efforts to communicate, below are the names and addresses of the PRPs to whom this letter is also being sent at this time:

ADD SIBLINGS
What, if anything should we add in about bankruptcy with ARS here?

Pursuant to CERCLA Section 113(k), 42 U.S.C. § 9613(k), EPA will establish the administrative record that will contain documents that will form the basis of EPA's decision on the selection of a response action for the Site. This administrative record will be open to the public for inspection and comment.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, the Superfund Small Business Liability Relief and Brownfields Revitalization Act was signed into law. This Act contains several exemptions and defenses to CERCLA liability, which EPA suggests that all parties evaluate. YOU may obtain a copy of the law via the Internet at http://www.epa.gov/swerosps/bf/sblrbra.htm and review EPA guidances regarding these exemptions at http://www.epa.gov/compliance/resources/policies/cleanup/superfund.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources and learn more about the Small Business Regulatory Enforcement Fairness Act at www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo.

Conclusion

The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final EPA position on any matter set forth herein. Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter immediate attention, consider consulting with an attorney, and respond to this letter within the time specified above. If you have any legal questions regarding this matter, please contact Lawrence Bradford, Assistant Regional Counsel, at (404) 562-____. For technical questions regarding the removal action, please contact Jeffery Crowley at (404) CELL NO. We appreciate and look forward to your prompt response to this matter.

Sincerely,

A. Shane Hitchcock, Chief
Emergency Response and Removal Branch

Enclosure

L. Bradford	D. Clay	F. Riveria
T. Moore	J. Crowley	J. McGuire

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PRESSES FOR INDUSTRY

20501 HOOVER ROAD, DETROIT, MICHIGAN 48205-1075, USA

www.PressesForIndustry.com

Email: pfi@pfisales.com

Tele: + 1 313 839 9300 Fax: + 1 313 839 9600

Please set aside if found. - Jeff

June 9, 2011

RE: American Screw Rivet Co.
Appraisal of 1625 Manse Jolly Road

ITEM	~~SIZE~~ QTY.	1625 MANSE JOLLY RD. DESCRIPTION	FORCED LIQUIDATION VALUE
	5	DECO SPIN DRYERS	42,500.00
SIZE	18"	STAINLESS BASKETS	4,500.00
SIZE	24"	STAINLESS BASKETS	5,760.00
	1	AIR COMPRESSOR, DRYER AND RECEIVING TANK	5,000.00
		1500 AMPS & 500 AMPS 240 VOLT RAPID RECTIFIERS	10,000.00
	LOT	COPPER BUSSING THROUGHOUT BUILDING	4,750.00
	LOT	LARGE QUANTITY OF SCRAP / ZINC BALLS	18,000.00
		TOTAL	**90,510.00**

BACK

4 ITEMS - 3 ITEMS SCRAP, UNDER ITEM (1 ITEM)

1 TRANSFORMER -

2 FUNCTIONS

SCRAP
$13 INCBS

COPPER
$3.50/LB
1LB/1FT.

DA - VAT 19
DISPOSE VAT 17
16
15 NO BAMOR
14
9
8
7

Parts and Pay less
AND Take ownership

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Re: Summary
David Andrews to: Jeffery Crowley 06/09/2011 11:58 AM

From: David Andrews/R4/USEPA/US
To: Jeffery Crowley/R4/USEPA/US@EPA

Terry Vincovish took us on a tour and identified that :

- Cyanide was never used in production during his tenure (16 yrs)
- The first two stages of the plating process (red tanks) contained pH 2 HCL
- The solids maintained a Non Haz disposal profile at the local Waste Mgt landfill
- EQ handled their haz/spent HCL waste.
- The sumps (three) contained solids/sludges from detergent (mild caustic) cleaner.
- Building/ facility drainage was plugged years ago after failure to obtain a electroplating permit.
- The 3 subterranean vaults out back are a "mystery" to him.
- Rain water from leaks was contained by the sumps and ran through a device that "evaporated" the water.
- There's another UST location on-Site that he's not familiar with regarding contents.
- Didn't get an answer regarding septic tank(s)

The additional polys encountered a "snag" on their delivery time. They are just leaving FL at this time and won't be delivered until Monday. Work will proceed as scheduled and waste transfer will commence on Monday. Jake is working WM to possibly resurrect the solids profile OR expedite a re-bid on both Haz & Non-Haz waste streams.

dave

Jeffery Crowley Can u shoot me a quick summary of what info th... 06/09/2011 11:19:41 AM

From: Jeffery Crowley/R4/USEPA/US
To: "Jerome Partap" <JPartap@otie.com>, David Andrews/R4/USEPA/US
Date: 06/09/2011 11:19 AM
Subject: Summary

Can u shoot me a quick summary of what info the ops guy gave yall today. I'd like to fine tune the money I'm asking for if possible. Thanks!

Jeffery J. Crowley
Federal On-Scene Coordinator
US EPA
(404) 562-9587

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* Jeff Crowley will be the OSC for the Removal part of the site.
individual samples of totes pH-5 were requested by Jeff to submit for TCLP
Outside totes pH=5

6/6/11	1754	T14
6/6/11	1749	T5
6/6/11	1804	T28
6/6/11	1759	T23

6/6/11
2008: START Berrios talked to Cliff and he informed ER pumped 24 totes pH=2 today

TCLP analysis

6/6/11.

American Screws & Rivets ER

Proposed samples:

		Analyte(s)	pH
①	Sumps (1-5)	Cyanide, Ni, Cu, Pb, Zn, Hex Cr	
②	Boxes (1-3)	" Hex Cr, Ni, Cu, Pb, Zn	"
③	Sediment/soil around boxes and ditch & pond (8 locations)	~~Cyanide, Hex Cr, TAL met~~ Hex Cr, pH, TAL met	
④	Totes pH = 2	Cyanide, Hex Cr, TAL met	
⑤	Totes pH = 10	Hex Cr, TAL met	
⑥	Totes pH = 5		

TAL metals for all waste streams (pH 2, pH 5, pH 10)

a) soil (stained outside the building and between the boxes) TAL Metals, CN, pH, Hex Cr

b) soils and sed of pond → TAL metal, Hex Cr

note: START will use the XRF for the soil & sediment sample locations to determine if TAL met or only Total Cr, Ni, Pb, Cu & Zn will be ~~Done~~ needed.

XRF readings

drain #1	drain #2	ditch	behind building
ASR-SS-02	ASR-SS-03	ASR-SS-04	ASR-SS-01
ND	ND	ND	
ND	ND	ND	
~~ND~~ ND	ND	ND	
ND	ND	ND	
ND	ND	ND	

ppm
Cr
Ni
Pb
Cu
Zn

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OTIE HAZCAT - DRUM INVENTORY FORM
PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME ASR TDD# _____ Drum # Sump 1
LOCATION (City, County, State) Anderson, SC
OSC Name _____ SAMPLER Nairmer Berrios
DATE SAMPLED 6/5/11 TIME SAMPLED ~~0955~~ 0950 WEATHER sunny TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL concrete
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☒ OTHER open

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER _____
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS
CHEMICAL NAME unknown
MFG. NAME _____
ADDITIONAL INFORMATION _____

FIELD READINGS
RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER _____
IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP				☒	DK BROWN				
MIDDLE				☒	OLIVE			☒	
BOTTOM				☒	DK BROWN				

FIELD HAZCAT TESTING
HAZCAT ANALYSIS BY: Nairmer Berrios WITNESS: Jerome Parfap
HAZCAT TEST DATE: 6/5/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR — NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)
PEROXIDE (Blue test pos) — NEG. ☒ POS. ☐ (IF PEROXIDE STOP TEST)
OXIDIZER (Black test pos) — NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT
pH (0-14) — 10 TOP; 5 MID; 10 BOT
REACTIVITY H20 (IF) — NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT
FLAMMABLE — NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT
COPPER WIRE (Green flame pos.) — NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP				☒	DK brown				
MIDDLE				☒	olive			☒	
BOTTOM				☒	DK brown				

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I
TOP	☐	☐	☒
MID	☒	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☒	☐	☐
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)
☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

11089755

OTIE HAZCAT - DRUM INVENTORY FORM

PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME ASR TDD# ~~DRUM#~~ Sump 2
LOCATION (City, County, State) Anderson, SC
OSC Name Jose Negron SAMPLER Nairmer Berrios
DATE SAMPLED 6/5/11 TIME SAMPLED 0950 WEATHER Sunny TEMPERATURE (F)

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL ☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER concrete sump

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS

CHEMICAL NAME unknown
MFG. NAME
ADDITIONAL INFORMATION

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER
IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS
TOP	X				DK. BROWN			X	INCHES
MIDDLE				X	green			X	
BOTTOM									

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: Nairmer Berrios WITNESS: Jerome Parfap
HAZCAT TEST DATE: 6/5/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)
PEROXIDE (Blue test pos) NEG. ☐ POS. ☐ ~~(IF PEROXIDE STOP TEST)~~
OXIDIZER (Black test pos) NEG. ☒ POS. ☐ TOP, ☒ ☐ MID, ☒ ☐ BOT
pH (0-14) 10 TOP, 10 MID, V BOT) 10
REACTIVITY H20 (IF NEG. ☒ POS. ☐ TOP, ☒ ☐ MID, ☒ ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS
TOP	X				DK. BROWN			X	INCHES
MIDDLE				X	green			X	
BOTTOM									

FLAMMABLE NEG. ☒ POS. ☐ TOP, ☒ ☐ MID, ☒ ☐ BOT
COPPER WIRE (Green flame pos.) NEG. ☒ POS. ☐ TOP, ☒ ☐ MID, ☒ ☐ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I
TOP	☒	☐	☐
MID	☒	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☐	☐	☒
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)

☒ Base-Neutral	☐ Base	☐ Peroxide
☐ Organic	☐ Acid	☐ Oxidizer
☐ Halogen	☐ Flammable	☐ Reactive

COMMENTS

OTIE HAZCAT - DRUM INVENTORY FORM
PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME ASR TDD# _____ Drum # Sump 3
LOCATION (City, County, State) Anderson SC
OSC Name Jose Negron SAMPLER Nairmer Berrios
DATE SAMPLED 6/5/11 TIME SAMPLED 1045 WEATHER Sunny TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER > concrete sump

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER _____
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS

CHEMICAL NAME unknown (cathe bed)
MFG. NAME _____
ADDITIONAL INFORMATION _____

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER _____
IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP				✓	green brown			✓	
MIDDLE				✓					
BOTTOM				✓				✓	

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: Nairmer Berrios WITNESS: Jerome Parlop
HAZCAT TEST DATE: 6/5/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)

PEROXIDE (Blue test pos) NEG. ☐ POS. ☐ (IF PEROXIDE STOP TEST)

OXIDIZER (Black test pos) NEG. ☒ POS. ☐ TOP ☐ MID ☐ BOT

pH (0-14) _____ TOP _____ MID _____ BOT > 10

REACTIVITY H20 (IF NEG. ☒ ☒ ☒ POS. ☐ TOP ☐ MID ☐ BOT

FLAMMABLE NEG. ☒ ☒ ☒ POS. ☐ TOP ☐ MID ☐ BOT

COPPER WIRE (Green flame pos.) NEG. ☒ ☒ ☒ POS. ☐ TOP ☐ MID ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP				✓	green brown			✓	
MIDDLE				✓					
BOTTOM				✓				✓	

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY

	S	P	I
TOP	☒	☐	☐
MID	☒	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)

	S	P	I
TOP	☐	☐	☒
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)

☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

OTIE HAZCAT - DRUM INVENTORY FORM
PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME ASR TDD# _____ Drum # Sump 4
LOCATION (City, County, State) Anderson, SC
OSC Name Jose Negron SAMPLER Nainmer Berrios
DATE SAMPLED 6/5/11 TIME SAMPLED 1100 WEATHER sunny TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER concrete sump

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER 3/3 cu yd
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS
CHEMICAL NAME unknown
MFG. NAME _____
ADDITIONAL INFORMATION _____

FIELD READINGS
RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER _____
IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP									
MIDDLE				X	green brown			X	
BOTTOM									

FIELD HAZCAT TESTING
HAZCAT ANALYSIS BY: Nainmer Berrios WITNESS: Jerome Parlap
HAZCAT TEST DATE: 6/5/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR — NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)

PEROXIDE (Blue test pos) — NEG. ☐ POS. ☐ (IF PEROXIDE STOP TEST)

OXIDIZER (Black test pos) — NEG. ☒ POS. ☐ TOP, ☒ MID, ☒ BOT

pH (0-14) — _____ TOP, _____ MID, _____ BOT } 10

REACTIVITY H20 (IF) — NEG. ☐ POS. ☐ TOP, ☐ MID, ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP				X				X	
MIDDLE				X	green brown			X	
BOTTOM				X					

FLAMMABLE — NEG. ☒ POS. ☐ TOP, ☒ MID, ☒ BOT

COPPER WIRE (Green flame pos.) — NEG. ☒ POS. ☐ TOP, ☒ MID, ☒ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I	ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☒	☐	☐	TOP	☐	☐	☐
MID	☒	☐	☐	MID	☐	☐	☒
BOT	☒	☐	☐	BOT	☐	☐	☒

Choose the Classification Group(s)
☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

OTIE HAZCAT - DRUM INVENTORY FORM
PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME AST2 TDD# _____ Drum # Sump 5
LOCATION (City, County, State) Anderson, SC
OSC Name Jose Nesom SAMPLER Naimer Berrios
DATE SAMPLED 6/3/11 TIME SAMPLED 1110 WEATHER Sunny TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER concrete sump

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER _____
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS

CHEMICAL NAME unknown
MFG. NAME _____
ADDITIONAL INFORMATION _____

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER _____

IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP									
MIDDLE				X	brown green			X	
BOTTOM									

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: Naimer Berrios WITNESS: Jerome Partap
HAZCAT TEST DATE: 6/3/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)

PEROXIDE (Blue test pos) NEG. ☐ POS. ☐ ~~(IF PEROXIDE STOP TEST)~~

OXIDIZER (Black test pos) NEG. ☒ POS. ☐ TOP ☐ MID ☐ BOT

pH (0-14) _____ TOP _____ MID _____ BOT 10

REACTIVITY H20 (IF NEG. ☐ POS. ☐ TOP ☐ MID ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP									
MIDDLE				X	brown green			X	
BOTTOM									

FLAMMABLE NEG. ☒ POS. ☐ TOP ☐ MID ☐ BOT

COPPER WIRE (Green flame pos.) NEG. ☒ POS. ☐ TOP ☐ MID ☐ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I
TOP	☒	☐	☐
MID	☒	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☐	☐	☒
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)

☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

OTIE HAZCAT - DRUM INVENTORY FORM
PRIOR TO ANY DRUM ACTIVITIES, GROUND DRUM (USE ONLY NON-SPARKING TOOLS)

SITE NAME ASR - ANDERSON SCRAP & WIRE TDD# _____ Drum # Sump #6
LOCATION (City, County, State) MAUSE JOHN RD. ANDERSON SC
OSC Name J. [illegible] / J. NEGRON SAMPLER [illegible]
DATE SAMPLED 6/9/11 TIME SAMPLED 1330 WEATHER _____ TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL ☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER concrete Sump

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☐ FAIR ☒ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER ~1 cu yd
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM LABELS / MARKINGS

CHEMICAL NAME unknown
MFG. NAME _____
ADDITIONAL INFORMATION _____

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID: % LEL/O2:
FID:
OTHER _____

IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP									
MIDDLE				X	brown			X	
BOTTOM				X				X	

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: _____ WITNESS: _____
HAZCAT TEST DATE: _____

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)
PEROXIDE (Blue test pos) NEG. ☐ POS. ☐ ~~(IF PEROXIDE STOP TEST)~~
OXIDIZER (Black test pos) NEG. ☒ POS. ☐ TOP ☒ ☐ MID ☒ ☐ BOT
pH (0-14) _____ TOP _____ MID _____ BOT } 10
REACTIVITY H20 (IF NEG. ☒ POS. ☐ TOP ☒ ☐ MID ☒ ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP									
MIDDLE				X	brown				
BOTTOM				X					

FLAMMABLE NEG. ☒ POS. ☐ TOP ☒ ☐ MID ☒ ☐ BOT
COPPER WIRE (Green flame pos.) NEG. ☒ POS. ☐ TOP ☒ ☐ MID ☒ ☐ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I
TOP	☒	☐	☐
MID	☒	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☐	☐	☒
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)
☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

OTIE HAZCAT - DRUM/TOTE/TANK INVENTORY FORM
PRIOR TO ANY ACTIVITY, GROUND CONTAINER (USE ONLY NON-SPARKING TOOLS)

SITE NAME AMERICAN SCREWS & RIVETS RESPONSE TDD# _____ Sump Drum # 7
LOCATION (City, County, State) ANDERSON, ANDERSON COUNTY, SC
OSC Name JOSE NEGRON/JEFF CROWLEY SAMPLER Alair
DATE SAMPLED 6/12/11 TIME SAMPLED 1010 WEATHER Sunny TEMPERATURE (F) _____

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL concrete sump
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED ☐ OTHER

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☒ FAIR ☐ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER ~5cuyd
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM/TOTE/TANK LABELS / MARKINGS

CHEMICAL NAME unknown
MFG. NAME unknown
ADDITIONAL INFORMATION liquid / sludge. dark green / dark brown

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID % LEL/O2:
FID
OTHER

IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS
TOP	X				brown			X	INCHES
MIDDLE				X	dark green			X	
BOTTOM									

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: Nairimer Berrios Cartagena WITNESS: Jerome Partap
HAZCAT TEST DATE: 6/13/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)

PEROXIDE (Blue test pos) NEG. ☒ POS. ☐ (IF PEROXIDE STOP TEST)

OXIDIZER (Black test pos) NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

pH (0-14): 10 TOP; 10 MID; 10 BOT

REACTIVITY H20 (IF H20 REACTIVE STOP TEST) NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS
TOP	X				brown			X	INCHES
MIDDLE				X	Dark green			X	
BOTTOM									

FLAMMABLE NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

COPPER WIRE (Green flame pos.) NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

	WATER SOLUBILITY S	P	I	ORGANIC SOLUBILITY (Hexane) S	P	I
TOP	☒	☐	☐	☒	☐	☐
MID	☒	☐	☐	☒	☐	☐
BOT	☒	☐	☐	☒	☐	☒

Choose the Classification Group(s)
☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS _____

OTIE HAZCAT - DRUM/TOTE/TANK INVENTORY FORM
PRIOR TO ANY ACTIVITY, GROUND CONTAINER (USE ONLY NON-SPARKING TOOLS)

SITE NAME: AMERICAN SCREWS & RIVETS RESPONSE TDD#: ~~Drum #~~ Sump 8
LOCATION (City, County, State): ANDERSON, ANDERSON COUNTY, SC
OSC Name: JOSE NEGRON/JEFF CROWLEY SAMPLER: Nair
DATE SAMPLED: 6/13/11 TIME SAMPLED: 1010 WEATHER: sunny TEMPERATURE (F):

DRUM TYPE: ☐ FIBER ☐ STEEL ☐ POLY ☐ STAINLESS STEEL ☐ NICKEL ☒ OTHER concrete sump
☐ POLY - LINED ☐ RING TOP ☐ CLOSED TOP ☐ OVERPACKED

DRUM CONDITION: ☐ MEETS DOT SPEC ☐ GOOD ☒ FAIR ☐ POOR
DRUM SIZE: ☐ 85 ☐ 55 ☐ 42 ☐ 30 ☐ 16 ☐ 10 ☐ 5 ☒ OTHER 5 cu yd
DRUM CONTENTS: ☒ FULL ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ < 1/4 ☐ EMPTY

DRUM/TOTE/TANK LABELS / MARKINGS

CHEMICAL NAME: unknown
MFG. NAME: unknown
ADDITIONAL INFORMATION: liquid/sludge - light green/dark green

FIELD READINGS

RADIATION BACKGROUND _____ mrem/hr
RADIATION READING _____ mrem/hr
PID % LEL/O2:
FID
OTHER
IF RAD ABOVE 5 REM STOP

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP	X				light green			X	
MIDDLE				X	dark			X	
BOTTOM									

FIELD HAZCAT TESTING

HAZCAT ANALYSIS BY: Rainmer Barnes WITNESS: Jerome Partap
HAZCAT TEST DATE: 6/13/11

RADIATION ☐ POSITIVE ☒ NEGATIVE (If Radiation Detected Do Not Test Further)

REACTIVITY AIR: NEG. ☒ POS. ☐ (IF AIR REACTIVE STOP TEST)
PEROXIDE (Blue test pos): NEG. ☒ POS. ☐ (IF PEROXIDE STOP TEST)
OXIDIZER (Black test pos): NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT
pH (0-14): 7 TOP; 10 MID; 10 BOT
REACTIVITY H20 (IF H20 REACTIVE STOP TEST): NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

LAYERS	PHYS. STATE: LIQUID	SOLID	GEL	SLUDGE	COLOR	CLARITY: CLEAR	CLOUDY	OPAQUE	LAYER THICKNESS: INCHES
TOP	X				light green			X	
MIDDLE									
BOTTOM				X	dark			X	

FLAMMABLE: NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT
COPPER WIRE (Green flame pos.): NEG. ☒ TOP ☐ POS. TOP; ☒ MID ☐ MID; ☒ BOT ☐ BOT

(S=SOLUBLE / P=PARTIALLY SOULUBLE / I=INSOLUBLE)

WATER SOLUBILITY	S	P	I
TOP	☒	☐	☐
MID	☐	☐	☐
BOT	☒	☐	☐

ORGANIC SOLUBILITY (Hexane)	S	P	I
TOP	☐	☐	☐
MID	☐	☐	☒
BOT	☐	☐	☒

Choose the Classification Group(s)
☒ Base-Neutral ☐ Base ☐ Peroxide
☐ Organic ☐ Acid ☐ Oxidizer
☐ Halogen ☐ Flammable ☐ Reactive

COMMENTS

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U.S. ENVIRONMENTAL PROTECTION AGENCY
$250,000 EMERGENCY ACTION MEMORANDUM/INITIAL POLREP

DATE: June 4, 2011

SUBJECT: **NOTIFICATION OF $250,000 ACTIVATION**
American Screw and Rivet
Anderson, Anderson County, South Carolina

FROM: Jose Negron, On-Scene Coordinator
Emergency Response and Removal Branch

THRU: Shane Hitchcock, Chief
Emergency Response and Removal Branch

TO: Franklin E. Hill, Director - Superfund Division
Regional Response Center, 4SF-ERRB
SCDHEC
Lisa Boynton, EPA-HQ, Regional Coordinator
Site File

Site No: B4J8
ERNS No: None
NPL Status: Non-NPL
CERCLIS No: SCR0000006635
State Notification: 06/02/2011
Demobilization Date: 06/30/2011

Task Order No:
TO Amount: $100,000
Contractor: Environmental Restoration
Response Authority: CERCLA
Start Date: 06/03/2011
Completion Date: 06/30/2010

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the American Screw and Rivet Site located at 1625 Manse Jolly Road, Anderson, Anderson County, South Carolina, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

II. Site Information

A. Site Description

Site Name: American Screw and Rivet
Superfund Site ID (SSID): B4J8
NRC Case Number:
CERCLIS Number: SCR000000635
Site Location: 1625 Manse Jolly Road, Anderson, SC 29623
Lat/Long: N34 35 28.75 W82 40 45
Potentially Responsible Party (PRP): American Screw and Rivet
NPL Status: Not listed
Removal Start Date: 06/03/2011

B. Site Background

1. Removal Site Evaluation

On June 02, 2011, EPA's removal program received from the South Carolina Department of Health and Environmental Control a referral for the assessment of the facility located at 1625 Manse Jolly Road, Anderson, Anderson County, South Carolina. On November 2010 SCDHEC received information that the facility had stopped operations and declared bankruptcy. In May 2011 SCDHEC conducted an inspection of the facility and documented leaking holding tanks and overflowing sumps. SCDHEC also documented the presence of approximately 80 poly totes some of which were labeled hazardous waste, drums, as well as other containers such as pails, small plastic drums and cardboard containers. On June 02, 2011 Telephone Duty received from the removal program DHEC's referral package and dispatched OSC Negron to conduct an assessment. On June 03, 2011 OSC Negron along with START personnel met with SCDHEC representatives and after obtaining access from the property owners and the bankruptcy trustee proceeded to enter the facility. Initial assessments from the facility revealed 44 poly totes exposed to the elements. Some totes exhibited cage corrosion and an advanced state of degradation. After entering the facility's building the OSC observed overflowing sludge filled sumps, water ponds in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation some of which had spilled their contents, drums and multiple other containers.

2. Physical location and Site characteristics

Although the area is primarily residential it also sustains industrial facilities, with residences located approximately one half block from the site.

3. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant

The materials released, and those under a threat of release, to the environment are "pollutants or contaminants" as defined by section 101(33) of CERCLA. Analytical results obtained prior to disposal will

determine whether any or all of the materials are, or contain, "hazardous substances" as defined by section 101(14) of CERCLA.

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

An actual release of material has been observed inside the facility with evidence of potential migration to the environment. Approximately 44 poly totes and approximately 23 drums containing wastes that may spill are exposed to the elements without containment. The materials are believed to be a mixture of wastes resulting from the facilities production operations.

B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

X Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].

X Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].

X Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].

X High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].

X Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].

X Threat of fire or explosion [300.415(b)(2)(vi)].

X The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].

X Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. Endangerment Determination under CERCLA Section 104: Pollutant or Contaminants

Actual or threatened releases of pollutants and contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation

On May 27, 2011, SCDEHC personnel conducted and inspection of the facility and discovered poly totes, drums, and other containers which appeared to be leaking and or threatening to release their contents. SCDHEC assessment of the property also documented that the building's roof is deteriorated and ruptured in at least one location with evidence of water filtration in multiple areas. SCDHEC referred the site to EPA.

2. *Removal activities to date*

a. Federal Government/Private Party

EPA TEL dispatched EPA R1 to inspect the site on June 03, 2011.OSC Negron, with START conducted an assessment of the site and determined that the conditions present warranted immediate action to prevent the uncontrolled release to the environment of unknown substances from poly totes, drums and other containers. START contractors conducted preliminary hazardous materials categorization and documented the presence of containers with flammable and highly corrosive materials exposed to the elements and without containment. On June 03, 2011 OSC Negron requested ERRS assistance to mobilize to the site and initiate actions directed to prevent the release of hazardous materials to the environment.

b. State/local

On May 27, 2011, SCDHEC visited the site and conducted and inspection of the facility and discovered poly totes, drums, and other containers which appeared to be leaking and or threatening to release their contents. SCDHEC referred the site to EPA.

B. Planned Removal Actions

1. *Proposed action description*
   a. Contain and remove free liquids, sludges and contaminated soils in areas which pose a threat of release to the environment and/or pose a threat of exposure to human and environmental receptors;
   b. Pump, overpack, stabilize, or otherwise secure containers found on-site to prevent further release of materials;
   c. Excavate contaminated soil from on-site and along run off pathway;
   d. Provide temporary onsite storage of wastewaters, sludges, contaminated soils, containers and wastes generated during removal and decontamination activities, pending further waste characterization and profiling for disposal/treatment/reuse/recycling;
   e. Collect samples of wastes generated during removal activities, may include hazard categorization or procurement of laboratory analytical services to facilitate disposal/treatment/reuse/recycling; and,

f. Arrange for off-site transportation disposal/treatment /recycling/reuse of hazardous substances.

2. *Contribution to remedial performance*
The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. *ARARs*
Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

4. Project Schedule
The period of performance for both contractors has been set from 06/03/2011 to 12/03/2011; however, it is anticipated that a majority of the work will be completed by 7/30/2011.

C. Estimated Costs*

ERRS Costs	**$190,000**
Contingency costs	**$20,000**
Total Removal Project Ceiling	**$210,000**

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

VI. Expected Change in the Situation Should Action Be Delayed or Not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VII. Outstanding Policy Issues

None

VIII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is $120,000 this amount will be funded from the Regional removal allowance.

Jose Negron,
Federal On-Scene Coordinator

Jun 4, 2011
Date

IX. Endangerment Determination under CERCLA Section 106: Hazardous Substances

"Actual or threatened releases of hazardous substances from this site may present an imminent and substantial endangerment to public health, or welfare, or the environment."

Shane Hitchcock, Chief
Emergency Response and Removal Branch
[Only in case of Endangerment Determination]

Date

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 28 2011

URGENT LEGAL MATTER – PROMPT REPLY NECESSARY
SENT VIA UNITED STATES POSTAL SERVICE: CERTIFIED MAIL

Robert W. Stein
126 Villa Drive
Osprey, Florida 34229-9168

Re: General Notice Letter and Invitation to Conduct a Removal Action at the American Screw & Rivet Company, 1625 Manse Jolley Road, Anderson County, Anderson, South Carolina

Dear Mr. Stein:

The purposes of this letter are to: (1) notify you of your potential liability, pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9607 (commonly known as the federal Superfund law), that you may have incurred with respect to the American Screw & Rivet Superfund Site (Site) located at 1625 Manse Jolley Road, Anderson, South Carolina; and (2) to offer you the opportunity to conduct or finance the removal action at the Site described herein.

The U.S. Environmental Protection Agency has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the Site. The EPA has spent, and is considering spending, additional public funds on actions to investigate and control such releases or threatened releases at the Site. Unless the EPA reaches an agreement under which a potentially responsible party (PRP) or parties will properly perform or finance such actions, the EPA may perform these actions pursuant to Section 104 of CERCLA.

Background

During November 2010, the South Carolina Department of Health and Environmental Control (SCDHEC) received information that American Screw & Rivet Corporation had stopped operations at 1625 Manse Jolley Road and 1 American Way Road in Anderson, South Carolina, and declared bankruptcy. As stated above, the subject of this letter is the property located at 1625 Manse Jolley Road, Anderson, South Carolina, which is referred to as the Site. On May 27, 2011, SCDHEC conducted an inspection of the facility located at 1625 Manse Jolley Road, and documented leaking holding tanks and overflowing sumps. SCDHEC also documented the presence of approximately 80 poly totes some of which were labeled hazardous waste, drums, and other containers such as pails, small plastic drums and cardboard containers.

On June 2, 2011, SCDHEC referred the Site to the EPA to conduct an assessment. On June 3, 2011, the EPA and its contractors began assessing the Site. The initial assessment outside the buildings revealed 44 poly totes that were exposed to the elements, some of which exhibited cage corrosion and an advanced state of degradation. Approximately 23 drums containing wastes were exposed to the elements

without containment. The materials are believed to be a mixture of wastes resulting from the facilities production operations. Inside the building, the EPA observed overflowing sludge filled sumps, water ponds in multiple areas, totes labeled with hazardous waste stickers and pH 2 annotations, cardboard containers in advanced state of degradation (some of which had spilled their contents), drums and multiple other containers. The building is in poor condition, with holes in the roof that allow for rainwater to enter the building.

After the initial assessment, the EPA initiated an emergency response action at the Site. The EPA is presently identifying threats and containing releases. Flammable and corrosive liquids have been identified. Evidence of uncontrolled migration into the environment is present. The EPA has deployed frac tanks and vacuum trucks to bulk liquids. This process involves utilizing the vacuum trucks to separate the liquid from the solid waste. Afterwards, the liquid is placed in the frac tanks for temporary storage. The EPA has also completed a partial removal of spilled materials from the building's floor. The EPA's emergency removal action will transition into a time-critical removal action, and the EPA will continue to conduct hazardous categorization and segregation of waste streams, and develop soil sampling plans.

Explanation of Potential Liability

PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at a site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered. Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a), and 9607(a), PRPs may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be liable for costs incurred by the EPA in cleaning up the site, unless they can show any of the statutory defenses. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities. In addition, PRPs may be required to pay for damages for injury to natural resources, or for their destruction or loss, together with the cost of assessing such damages. Where site conditions present an imminent and substantial endangerment to human health, welfare, or the environment, the EPA may also issue an administrative order under CERCLA to require PRPs to commence cleanup activities.

Based on the information collected, including documentation showing the release and/or disposal of hazardous substances at the Site, the EPA believes that you may be a PRP and potentially liable under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a) as the current owner of the real property and the owner of the real property at the time of the disposal for the costs of cleaning up the Site, including all costs incurred by the EPA in responding to releases at the Site.

Removal Action Required

The EPA has determined that the removal action shall include the following:

a. Contain and remove free liquids, sludges and contaminated soils in areas which pose a threat of release to the environment and/or pose a threat of exposure to human and environmental receptors;

b. Pump, over pack, stabilize, or otherwise secure containers found on-site to prevent further release of materials;

c. Excavate contaminated soil from on-site and along run off pathway;

d. Provide temporary onsite storage of wastewaters, sludges, contaminated soils, containers and wastes generated during removal and decontamination activities, pending further waste characterization and profiling for disposal/treatment/reuse/recycling;

e. Collect samples of wastes generated during removal activities, may include hazard categorization or procurement of laboratory analytical services to facilitate disposal/treatment/reuse/recycling; and,

f. Arrange for off-site transportation disposal/treatment /recycling/reuse of hazardous substances.

Scrap Metal

The EPA anticipates that there may be certain scrap metal from the Site that could be sold to a metal recycler, and those funds could be credited against the expenses that the EPA has, or may incur, with respect to the cleanup. If it comes to pass that you or American Screw & Rivet Corporation owns the scrap metal free and clear of any encumbrances, including liens, and it is no longer subject to the jurisdiction of any bankruptcy court, the EPA would request that you and/or American Screw & Rivet Corporation agree to allow the EPA to remove scrap metal from the Site and credit any proceeds received from the sale of the scrap metal against the costs incurred by the EPA during the cleanup of the Site. The EPA will discuss this matter with you further as the removal is being performed.

PRP Response / Invitation to Conduct Removal Action

You are encouraged to contact the EPA if you are interested in participating in negotiations to perform and/or finance the above described removal action at the Site. If you choose to enter into negotiations with the EPA regarding your performance of the above described removal action, please respond in writing by providing a statement of your willingness and financial ability to conduct the removal action and reimburse the EPA for costs already expended, and costs that the EPA will incur in overseeing the performance of the removal action. The response is due **within seven (7) calendar days** of your receipt of this letter. The EPA will then send you a draft Settlement Agreement in order to initiate a period of formal negotiations.

If a response to participate in negotiations is not received by the EPA **within seven (7) calendar days**, the EPA will assume that you have decided not to conduct the removal action and reimburse the Superfund for the Site expenditures. Please be aware however, that you will remain potentially liable for the EPA's costs incurred in undertaking activities pursuant to CERCLA and the National Contingency Plan (NCP) at this Site. The EPA may then take appropriate action at the Site, which may include: (1) conducting the removal action and pursuing a cost recovery claim under Section 107 of CERCLA against you or (2) issuing a Unilateral Administrative Order (UAO) to you under Section 106(a) of CERCLA, 42 U.S.C. § 9606, requiring you to perform the work. Note that if the recipients of a UAO refuse to comply, the EPA may pursue civil litigation against the recipients to require compliance.

Responses to this notice letter may be sent by regular or electronic mail and should be sent to:

Lawrence Bradford
Assistant Regional Counsel
U.S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, Georgia 30303
bradford.lawrence@epa.gov

Please note that, because the EPA has a potential claim against you, you must include the EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Information to Assist You

The EPA would like to encourage communication between you, other PRPs, and the EPA at the Site. To assist you in their efforts to communicate, below are the names of the PRPs to whom this letter is also being sent at this time:

a. Elizabeth Ann Stein Cartlidge
b. Mary Susan Stein
c. Nancy Marie Stein
d. John Richard Stein
e. William L. Stein

Pursuant to CERCLA Section 113(k), 42 U.S.C. § 9613(k), the EPA will establish the administrative record that will contain documents that will form the basis of the EPA's decision on the selection of a response action for the Site. This administrative record will be open to the public for inspection and comment.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, the Superfund Small Business Liability Relief and Brownfields Revitalization Act was signed into law. This Act contains several exemptions and defenses to CERCLA liability, which the EPA suggests that all parties evaluate. You may obtain a copy of the law via the Internet at http://www.epa.gov/swerosps/bf/sblrbra.htm and review the EPA guidance regarding these exemptions at http://www.epa.gov/compliance/resources/policies/cleanup/superfund.

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources and learn more about the Small Business Regulatory Enforcement Fairness Act at www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo.

Conclusion

The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final EPA position on any matter set forth herein. Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, the EPA strongly encourages you to give this matter immediate attention, consider consulting with an attorney, and respond to this letter within the time specified above. If you have any legal questions regarding this matter, please contact Lawrence Bradford, Assistant Regional Counsel, at (404) 562-8964. For technical questions regarding the removal action, please contact Jeffery Crowley at (404) 562-8773. We appreciate and look forward to your prompt response to this matter.

Sincerely,

A. Shane Hitchcock, Chief
Emergency Response and Removal Branch

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MEMORANDUM

Subject: Notice of cost reallocation for the American Screw and Rivet Site, Anderson, Anderson County, South Carolina

From: Jeffery J. Crowley, On-Scene Coordinator 7/20/11
Emergency Response and Removal Branch

To: Site File

This memorandum is to document a cost reallocation for the American Screw and Rivet Site, Anderson, Anderson County, South Carolina. This reallocation is to increase the START ceiling for the Site. The new Estimated Costs will be as follows:

Extramural Costs:

Regional Allowance Costs:	
ERRS	$1,100,000
Non-Regional Allowance Costs:	
START	$105,000
IAG	$5,000
Subtotal, Extramural Costs:	$1,210,000
Contingency:	$154,000
TOTAL EXTRAMURAL COSTS:	**$1,364,000**

Cc: Katrina Jones
Jim McGuire
Monty Bates

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One American Way
(American Screws & Rivets Corp.)

"Rite in the Rain"®
ALL-WEATHER
UNIVERSAL
No. 371

INCH

"Rite in the Rain®"
ALL-WEATHER WRITING PAPER

Name _____

Address 1 American Way
Anderson, SC 29621

Phone _____

Project American Screws & Rivets (American Way) (ASR-AW)

CONTENTS

PAGE	REFERENCE	DATE

KSL- One American way
Anderson, SC 6/14/2011

1016: START & EPA arrived to the site to conduct a site recognition (second time)
1020: OSC noticed 2 fuel tanks & approximately 5 steel drums are missing from site, based on information gathered on the first visit.
1045: START is ~~conducting~~ (NB) collecting samples from each container, label each container, talking pictures and filling the hazcat sheets.
1330: START leaving the site to perform the hazardous categorization in the other site (for security purposes)
1400: START conducting hazcat for every sample
1730: START finished hazcat process; (Refer to hazcat sheets)
note: START will summarize all information in a table

6/14/2011

6/15/2011

1039: START Berrios arrived to the site to collect samples which will be submitted to AES laboratory: TCLP metals, corrosivity and ignitability

1051: START preparing to collect sample of the stained soil in the back of the building.

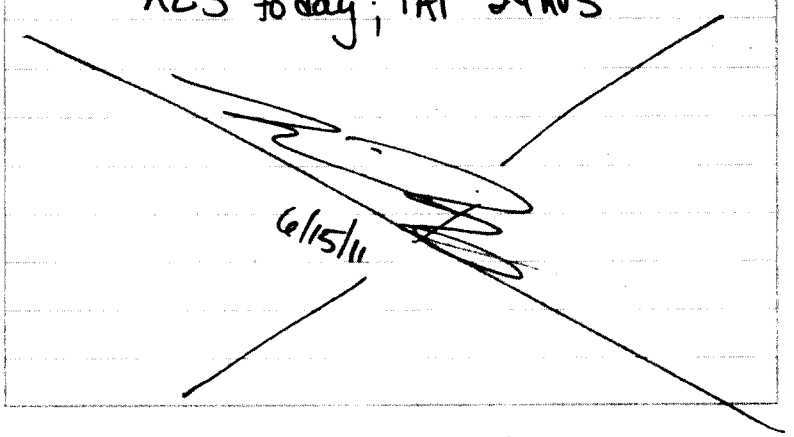
1055: Soil sample collected

1100-1131: START collected all samples (6) to be submitted to the lab.

1135: START Berrios leaving the site.

1200: START preparing samples to be sent to the laboratory; labels & Chain of Custody

note: START will deliver the samples to AES today; TAT 24 hrs



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ASR - American Way
Anderson, SC 6/16/2011

0740: ERRS (ER) arrived to the site to prepare stained soil areas to be excavated.

0815: START Berrios arrived to the site to conduct oversight and document activities
note: soil affected areas will be sampled every 6 inches as necessary.
0830: OSC Crowley arrived to the site and discussed logistics for the day: soil areas to be excavated; 2 areas. Area #1: square from machinery in bushes to the tree line in the back side drums area continuing in an L shape with asphalt patch (stained). Area #2; in front of tote #1.
note: The excavation process will dig all sludge and soil within 0-6 inches
0900: START, EPA & ERRS leaving the site until excavator arrives.
1000: START & ERRS arrived to the site with ~~forth tiff~~ Bobcat Excavator an excavator.
1020: ERRS began moving pallets with drums.
Note: Samples from soil (stained) will be analyzed for VOC, SVOC, TAL metals and PCB.

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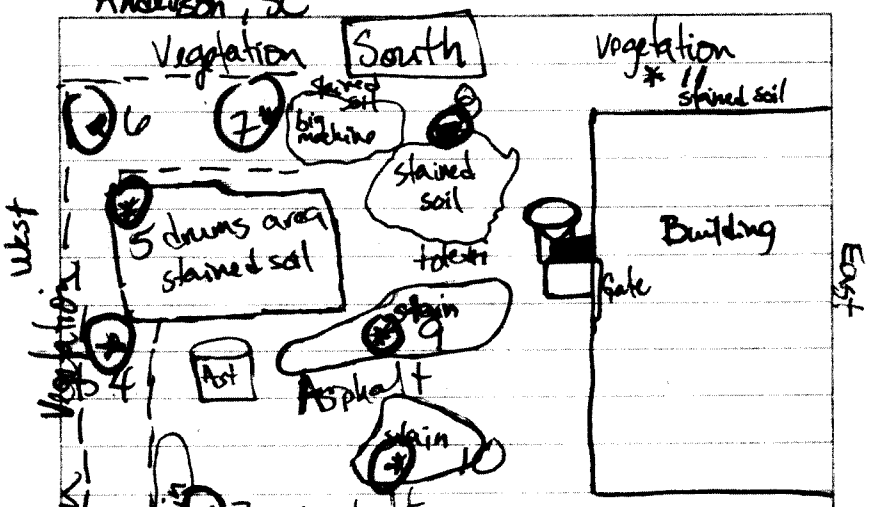
ASR - American Way 6/16/2011 5
Anderson, SC



- dashed area: designated to be excavated at least 6 inches to scrape the stain soil
note: analyses will be with a TAT of 48 hrs.
TCLP sample from soil pile (for disposal)
* sample locations proposed; not all will be submitted for VOC analysis.
1145: ERRS still scraping stained soil at the L shaped Vegetation area
1200: EPA, ERRS & START leaving the site to buy supplies needed for after lunch tasks.

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American St&R - American way
Anderson, SC
6/16/11

1300: ERRS & START arrived to the site
1301: ERRS scraping soil at the L shaped vegetation area and vibrating drums close to the AST
1330: START & ERRS discussing areas of asphalt to be removed in order to collect soil samples underneath.
1405: ERRS finished removing asphalt patches of sample locations:

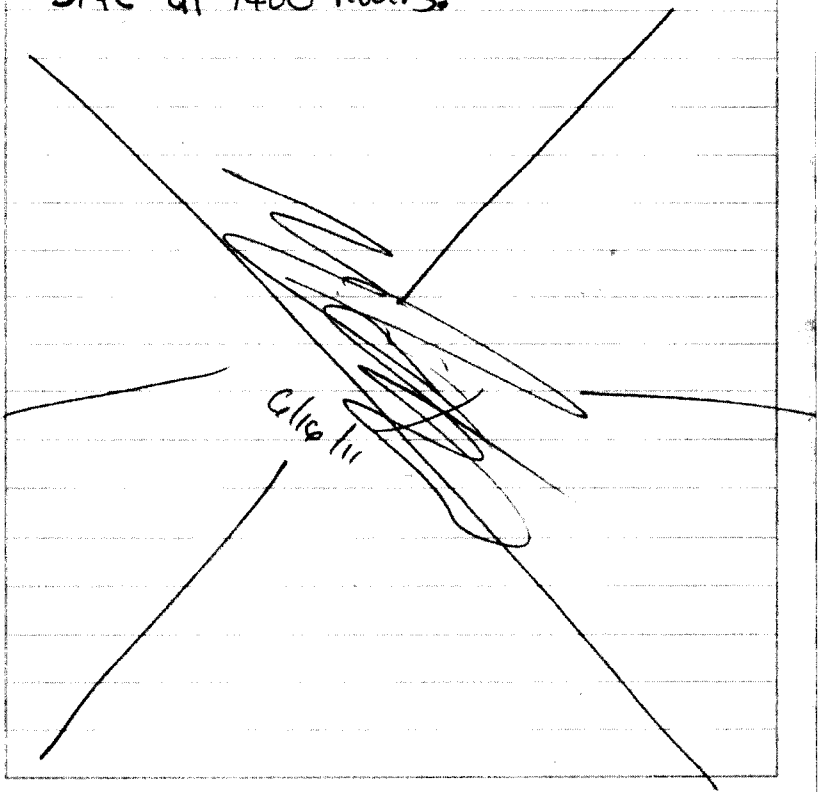
1410: START began collecting samples
1500: ASR-AW-SS01 (no VOCs)
1510: ASR-AW-SS02 (no VOC)
1529: ASR-AW-SS~~04~~10
1605: ASR-AW-SS04
1613: ASR-AW-SS05
1635: ASR-AW-SS06
1650: ASR-AW-SS07
1620: ASR-AW-SS08
1551: ASR-AW-SS09
1635: ASR-AW-SS~~02~~03
1645: ASR-AW-SS11 (NO VOC)
1700: ASR-AW-SSBK (background)
VOC, TAL Met, PCB & SVOC

Scale: 1 square=

ASR - American Way

6/16/11

1015: ASR - AW - Soil pile (TCLP)
1720: START leaving the site to prepare sample jars to be shipped
1800: START arrived to the FedEX location to drop off samples coolers.
late note: CID Frank Garcia and DHEC Investigator Zachary Owen, visited the site at 1400 hours.



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8 ASR-AW

Anderson, SC 06/17/11

Weather: partially clouded @ 75°F

0805: START arrived to the site. will suit up in level B to open an inflated (bloded) drum that needs to be hazcat it. (SD3)

note: ERRS arrived to the site at 0745 to continue with the stained soil removation and clean the asphalt area.

0824: START suited up in level B

0825: ERRS in level B (Jake Jones)

0826: ERRS opened the SD3

0830: START & ERRS monitoring drum with multiRAE:
VOC reading avg → 0.3 ppm

0843: START discussing logistics for transporting drums from the site. A manifest has to be in place and filled; drums has to be overpacked

0850: START taking pictures of the progress, removing asphalt patches and relocating drums to the NT area.

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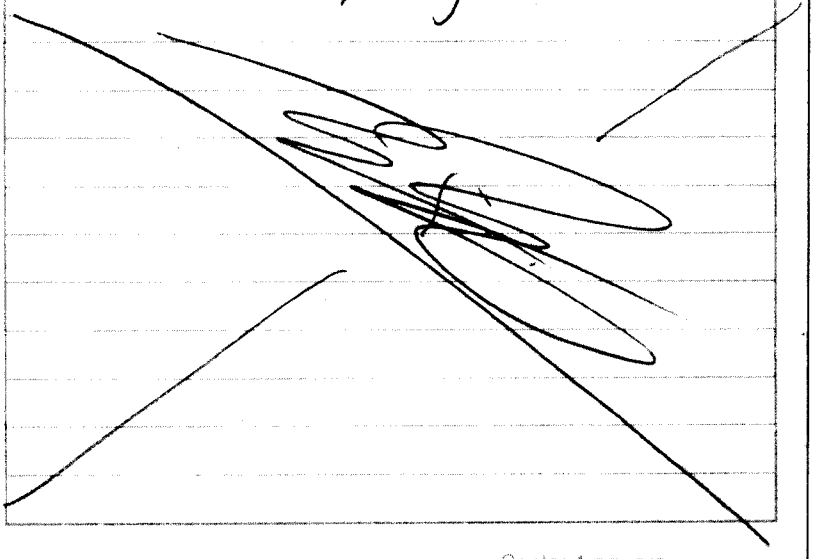
ASR - AW
Anderson, SC 6/17/11

1430: START arrived to the site
ERRS is ready to overpack drums and transport it to ASR
START getting ready to sample (pH & ignitability) the drum
1445: START tested sample of PD26 neg. flammability
pH - 3
collected sample for hazcat
1501: START taking pictures of over-packing process & asphalt path removed
1510: START leaving the site



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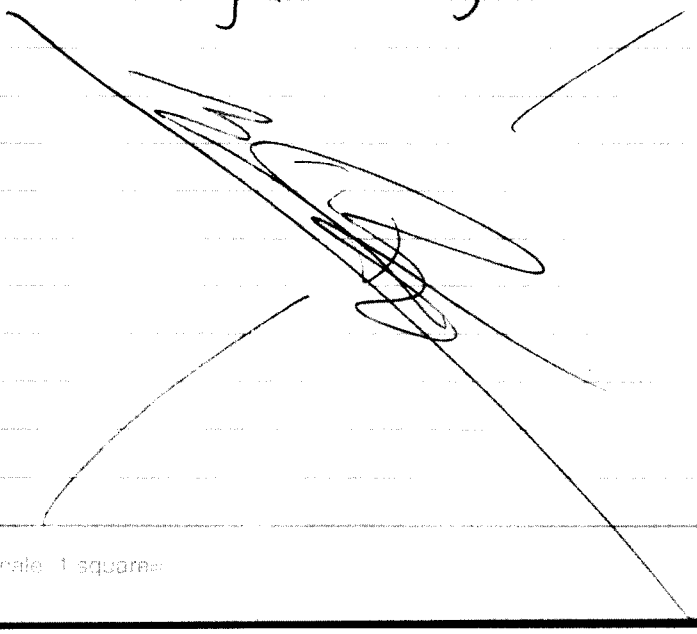
10

6/20/11

0900: START Barnes reviewing laboratory results of waste submitted on Wed. 6/15/2011. Summary:
3 samples → flammable
2 samples → pH 0
note: 1 flammable sample is positive for chloride
1000: START arrived to the site to take pictures of activities conducted on Saturday 6/18/11.
1130: START leaving the site.
NOTE: laboratory results will be sent tomorrow during the morning



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6/2/11

1145: START arrived to the site to document progress.

1152: START taking pictures of the asphalt (scrapped)

1207: ERRS + START + EPA verifying subsurface soil around sample location ASR-ACOSSOL

2 trucks of gravel
2 trucks of top soil
grass
} for the areas where soil was removed

1210: EPA + START + ERRS discussing logistics for final tasks on site.

- stained areas will be shoveled and place ~~inside~~ in the soil pile (mix it)
- machines will be covered with poly liners

note: machines (vat like): the liquid was transfer to a steel drum and the remaining was mixed with absorbant material.

- mixed soil (soil pile) will be transfered in a roll off.

1220: START leaving the site.

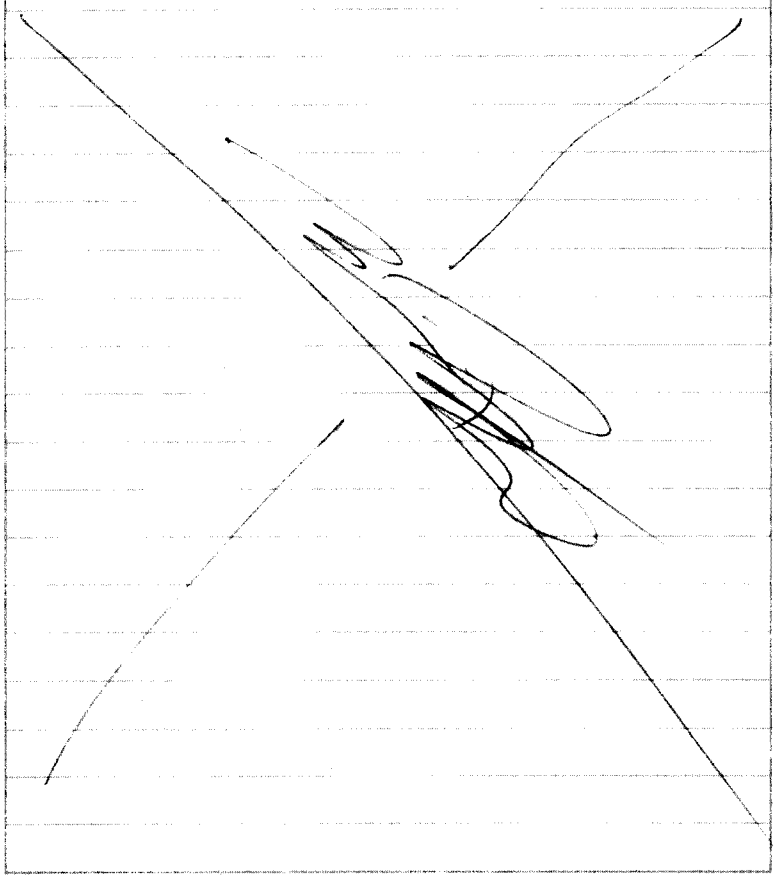
2000: START creating tables of samples submitted on ~~6/16~~ 6/15 & 6/16 (waste & soil samples).

12 ASR-AW

Anderson, SC 6/21/2011

2200: START finished ** results tables and send it to the OSC (Jeff Crowley).

note: ERRS finished tasks at the site and return to the main site at 1700 hours.



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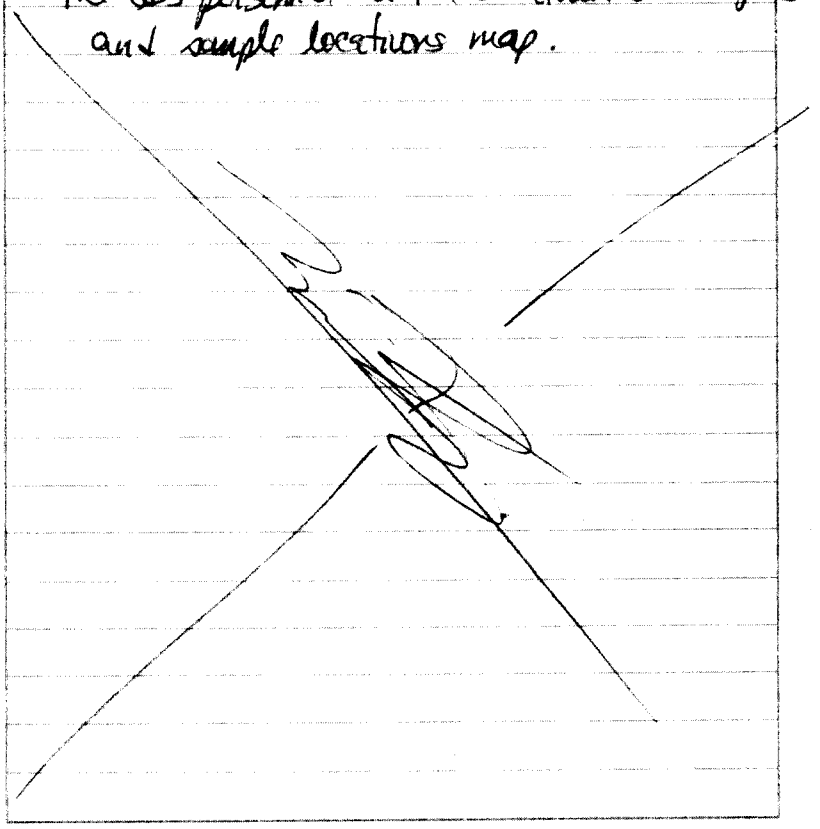
ASR-AW
Anderson, SC 6/02/11

1750: START arrived to the site to take pictures of activities performed yesterday 6/21/11.
ERRS did not work today on site.
1815: START leaving the site.
note: START sent thruple shape files to the GIS personnel for the creation of figures and sample locations map.



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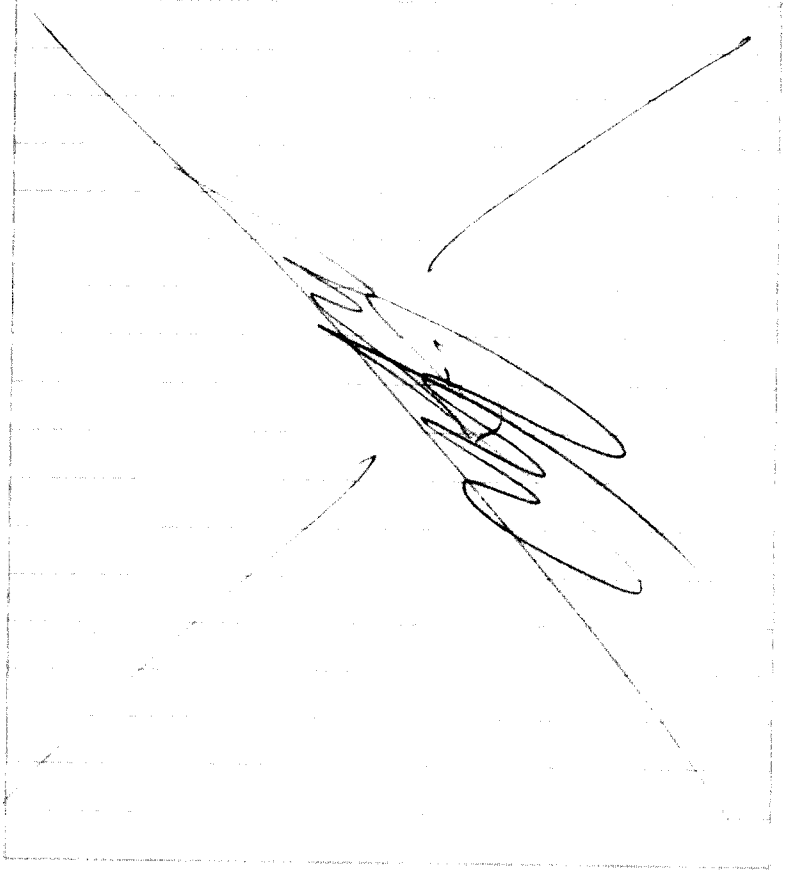
14

6/23/11

1600 : START working on edits of figures 1-3.

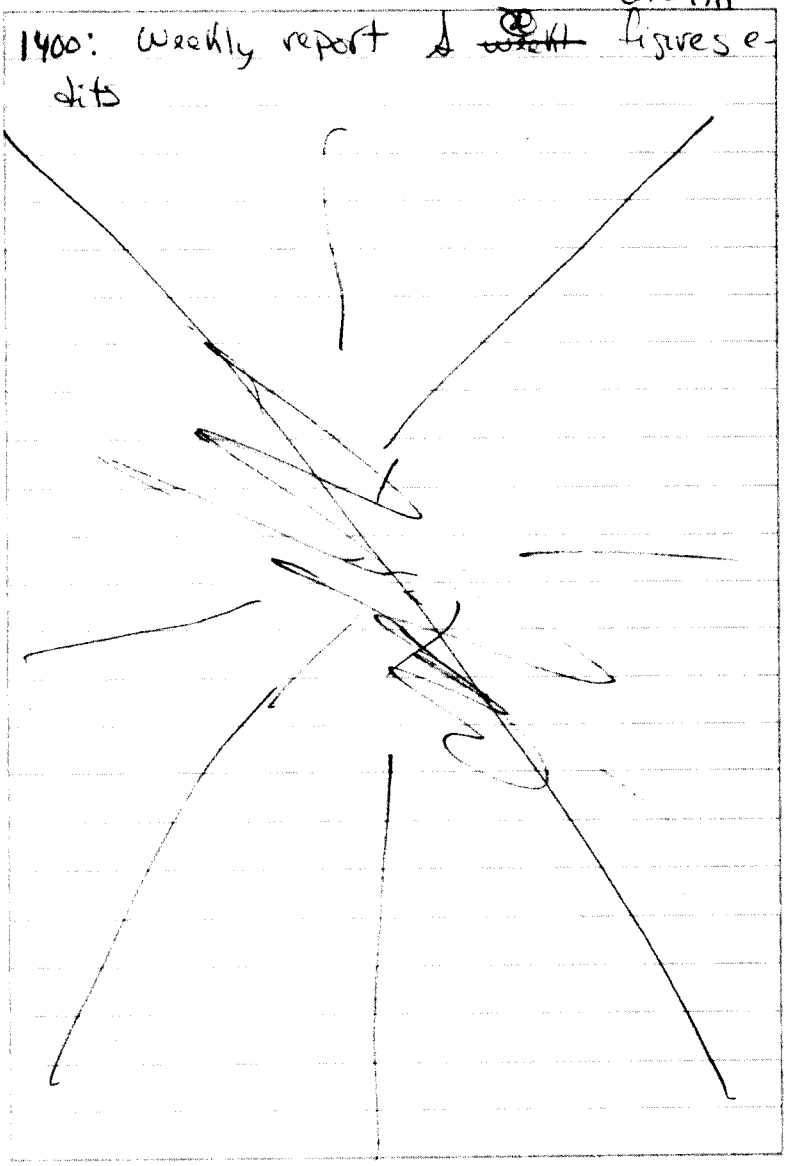
note: START has to add samples information into Scribe.

1700: START finished with figure edits.



6/24/11

1400: Weekly report & ~~week~~ figures edits



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7/6/11

1600: START & EPA arrived to the site with a bank mediator for ASR - ACO & ASR

1605: EPA & START & W.M. Hales walking inside the building to verify progress of cleaning and organization in all rooms.

1620: START and EPA taking pictures of stock pile and outside the building to check if anything had change.

1625: EPA noticed a tray with screws and oil outside close to the stock pile ~~that~~ surrounded by a big drain

1630: ~~EPA~~ EPA advise the person working at the building to clean it to avoid liability

1645: START, EPA and W.M. Hales (in charge brother) left the site.

note: the property does not pertain to the Stains anymore

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7/20/11

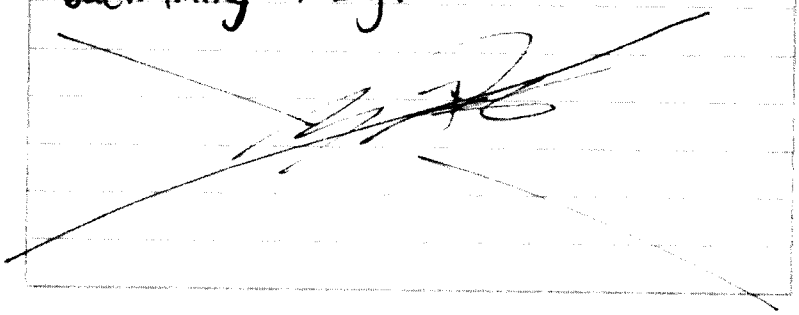
0830 - ARRIVE ON SITE; ERRS BEGIN BACKFILL OPERATIONS AT SITE
0945 - ROLL OFF BOX DELIVERED FOR CONSTRUCTION DEBRIS; LOADED
0900 - ~~START~~ SPOKE w/ S. HALES; POLY TANK HAS LOT #273 ASSIGNED ALONG w/ OTHER EQUIPMENT WHICH HAS LOT #'S ASSIGNED; SKIP HALES INDICATED THAT LOT #'S INDICATE ITEMS FOR AUCTION; AUCTION SCHEDULED ~~FOR~~ 8/10/11; THESE ITEMS SHOULD BE LEFT ALONE
0945 - TRUCKLOAD OF SOIL FOR BACKFILL; SO FAR 2 TRUCKLOADS OF GRAVEL ALSO ON SITE; ERRS SPREADING ~~RACE~~ GRAVEL
1000 - START OFFSITE
1335 - ARRIVE ON SITE; ERRS CONTINUE W/ BACKFILLING OPERATIONS
14:5 - START LEFT SITE; CREW ON WAY TO PICK UP SEEDING

J-P

18

7/25/11.

1000: START arrived to the site
- ERRS onsite, a roll off boxes for soil pile onsite
- 10 bucketes loads in each roll off box
note: an additional roll off box is needed for the remaining soil.
1001: Roll off boxes off site (1 & a)
1100: START offsite
1311: START on site
ERRS already onsite loading the remaining soil from soil pile into roll off truck
1330: 7 full bucket loads roll off truck off site
1350: ERRS back filling area where the soil pile was located.
1400: START off site. ERRS will complete the back filling today.



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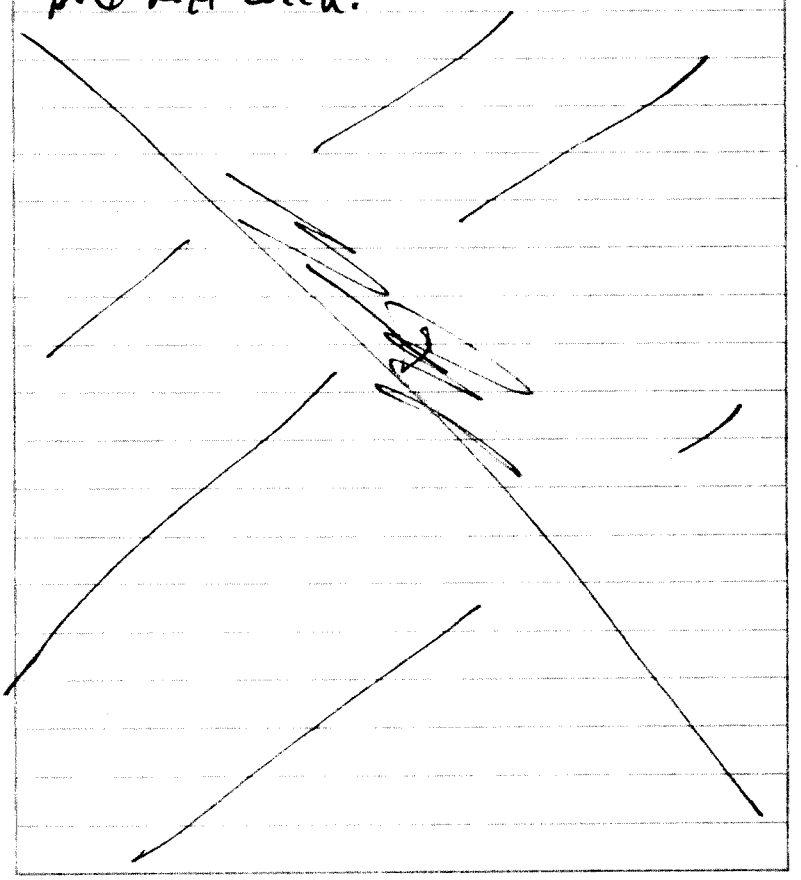
7/28/2011

0730: START and OSC discussing sample locations around the property; 2 feet full suite; 4 samples

0800: START & CPA finish discussing logistics for the sampling that will take place next week.



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8/1/11

95°F - PARTLY CLOUDY
1045 - LEFT FOR SITE
1120 - ARRIVE @ SITE
1220 - SET UP FOR SOIL SAMPLING
1330 - BEGIN ON ASRAW-SB03
ASRAW-SB03 @ 1350 -
VOC, SVOC, % MOISTURE, PCBs, TOTAL CYANIDE
~~TAL~~ METALS
ASRAW-SB100 (DUPLICATE OF ASRAW-SB03
@1355 - VOC, SVOC, % MOISTURE, PCBs,
TOTAL CYANIDE, 8-RCRA METALS
1415 - PREPARE SAMPLES
1430 - ASRAW-SB02 - VOCs, SVOCs
PCBs, % MOISTURE, TOTAL CYANIDE, TAL METALS
1440 - PREPARE ASRAW-SB02
SAMPLES
1450 - ASRAW-SB01 - VOCs, SVOCs
~~SPLES PAR~~ TOTAL CYANIDE, PCBs
TAL METALS
1515 - PREPARE SAMPLES
1530 - ASRAW-SB04 - VOCs, SVOCs,
PCBs, TOTAL CYANIDE, TAL METALS
1600 - PREPARE SAMPLES
1610 - START WASTE

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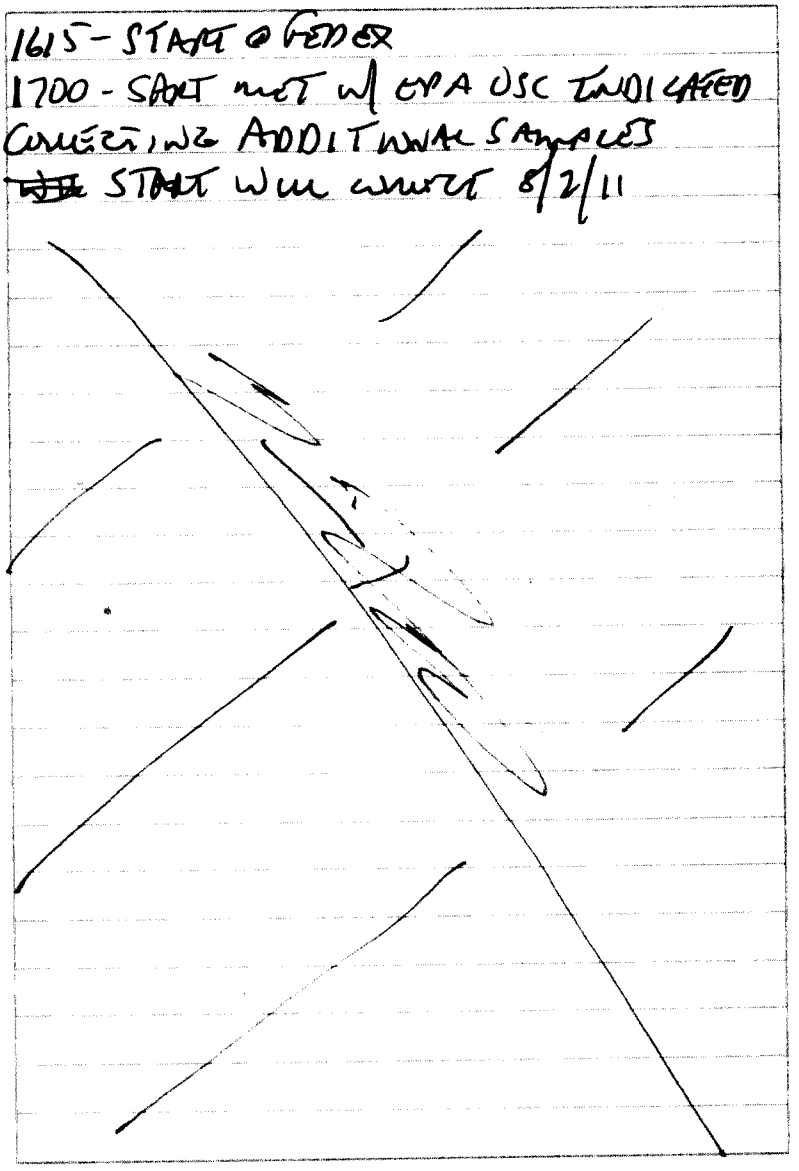
1615 - START @ FEDEX
1700 - START MEET W/ EPA OSC TO INDICATED
COLLECTING ADDITIONAL SAMPLES
~~DRILL~~ START WELL CONSTR 8/2/11



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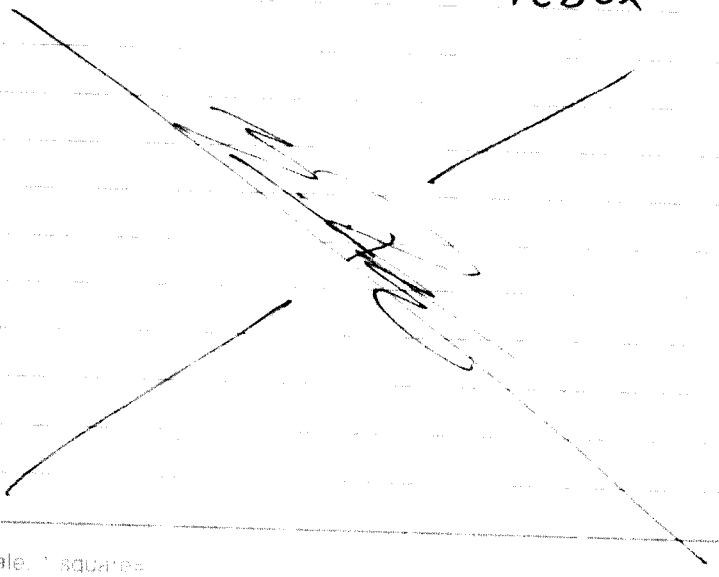
8/4/11

0545 - START LEAVE FOR SITE
0610 - START ON SITE; JIMMIE WALKER W/S. HAYES GROUP ON SITE HE INDICATED SEVERAL ITEMS STOLEN AND BREAK IN AT FACILITY
0615 - START COLLECT ASRAW-SB05 2FT DEPTH SAMPLE

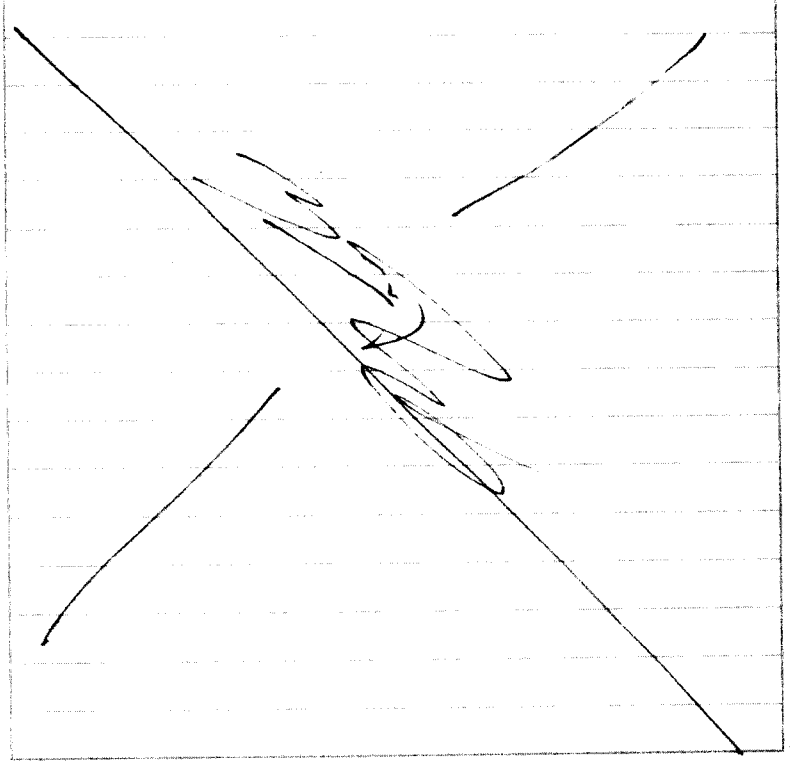
1645 - COLLECT ASRAW-SB06

1700 - PREPARE SAMPLES/START OFFSITE
1800 - DELIVER SAMPLES TO FEDEX



9/27/11

~~TR~~ 0815 – WASTE HAMMER (ENVIRONMENTAL OPTIONS, INC, ROCKY MOUNT, VA (540-483-3920)
0830 – BEGIN LOADING SEMI-TRAILER W/DRUMS
1000 – LOADING COMPLETE; ALL DRUMS AND OVERPACKS WERE STORED AT THE ASR-MANGE SOUTH SITE;
1015 – WASTE HAMMER OFF SITE



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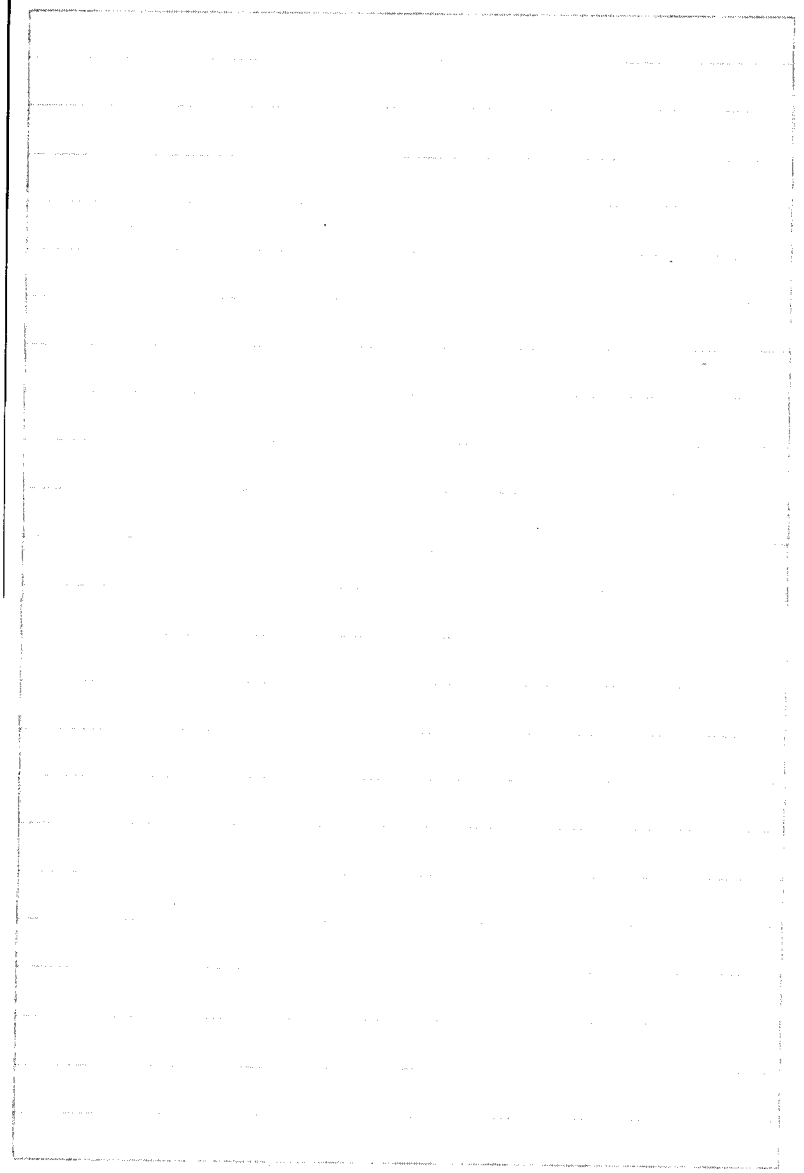

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Site: EPS40704 129 ASR American Way Site Site #:B4K1
Contractor: ERLLC. Ref# A4-129

Delivery Order #: 129
Contract #: EP-S4-07-04

REF #	COMMENTS
163-O	Service Date: 06/18/11, Vendor: Carolina Security, Security - 06/17 - 06/18: Additional costs to meet wage determination.
164-O	Service Date: 07/28/11, Vendor: AES, Inc., Analytical: TCL Volatile Organics - Aqueous (1 Analysis at $90.00/Analysis = $90.00) TCL-Semivolatile Organics - Aqueous (1 Analysis at $175.00/Analysis = $175.00) Total RCRA Metals by ICP - Aqueous (1 Analysis at $85.00/Analysis = $85.00) Shipping/Handling = $22.00 Total = $372.00
165-O	Service Date: 07/20/11, Vendor: American Waste Mngt, Transport-Non-Haz Debris 07/20/11 - Manifest #: 00001 = 0.99 Tons
TASK	CODES: 13 = Operations, 3 = Disposal

* IN THE 'CMT' COLUMN DENOTES A DISPUTED ITEM

PERCENTAGE OF CEILING UTILIZED: 31.09%. DO End Date: 05/01/12

TOTAL DAILY COSTS (excluding Pending): $8,930.86

TOTAL COSTS TO DATE (including Pending) $30,781.62

SIGNATURE OF USC REPRESENTATIVE

8/31/11
DATE

SIGNATURE OF CONTRACTOR'S REPRESENTATIVE

8/1/11
DATE